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**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

Marvin Faulkner and
Samuel C. Umunna;
[Plaintiff(s) herein, come
Individually of themselves];

Plaintiff(s)

v.

ANNA M. LOFTUS;
WILLIAM FARROW;
PIERCE & ASSOCIATES;
FEDERAL DEPOSIT
INSURANCE CORP;
URBAN PARTNERSHIP BANK;
SHOREBANK;
CHUHAK & TECSON, P.C.;
MICHAEL A. EURICH;
VILLA CAPITAL PROPERTIES;
GEORGE F. SCULLY JR.;
ELIZABETH LYONS;
DARRLY B. SIMKO;
CITY OF CHICAGO;
ALFRED M. SWANSON JR;
LASALLE BANK NATIONAL, as Trustee)
for Certificate Holders of Bear Stearns Asset)
Backed Securities I, LLC, Asset-Backed;)
Certificates, Series 2007-HE6;)
MORTGAGE ELECTRONIC)
REGISTRATION SYSTEMS;)
ENCORE CREDIT;)
EMC MORTGAGE CORPORATION;)
BEAR STEARNS ASSET BACKED)
SECURITIES I LLC;)
NATIONSTAR MORTGAGE, LLC;)
CITIMORTGAGE, INC.;)
BEAR STEARNS ASSET BACKED)
SECURITIES I TRUST 2007-HE6;)
FEDERAL NATIONAL MORTGAGE)
ASSOCIATION;)
FIRST FRANKLIN MORTGAGE;)
US BANK NATIONAL ASSOCIATES;)
MICHAEL N. VARAK;)
BRYAN GOMEZ;)
KOVITZ, SHIFRIN & NESBIT)

CIVIL-RICO ACTION
and other counts...

Case No.: 16-cv-02432

HONORABLE JUDGE
Edmond E. Chang

MAG. JUDGE

FILED

APR 24 2017

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

PLAINTIFFS' DEMAND
FOR A TRIAL BY JURY

LAW OFFICE;)
 MEREDITH FREEMAN;)
 EDWARD J. LESNIAK;)
 ALEXANDER D. MARKS;)
 PAMELA MCLEAN MEYERSON;)
 BURKE, WARREN, MACKAY &)
 SERRITELLA, P.C.;)
 CHRISTINA PLACE II)
 CONDOMINIUM ASSOCIATION;)
 RAYMOND W. MITCHELL;)
 IRWIN J. SOLGANICK;)
 ALEXANDER P. WHITE;)
 TIMOTHY L. ROWELL;)
 STARR, BEJGIERT, ZINK & ROWELLS;)
 CODILIS & ASSOCIATES;)
 COOK COUNTY SHERIFF'S)
 POLICE DEPARTMENT;)
 SONIA PASQUESI;)
 JOHN AVGERINOS;)
 PAUL AVGERINOS;)
 SAMANTHA L. BABCOCK;)
 ERIK HUBBARD;)
 HAUSELMAN, RAPPIN &)
 OLSWANG, LTD;)
 RODERICK PIERCE;)
 [All government defendant(s) are)
 being sued in his/her Individual and/or)
 their Official capacity],)
 Defendant(s),)

"PLAINTIFFS' SECOND AMENDED VERIFIED COMPLAINT-CIVIL RICO"

1. Now comes Plaintiffs, Marvin Faulkner ("**Faulkner**") and Samuel C. Umunna ("**Umunna**"), by and of themselves; pursuant to RICO under 18 U.S.C. §1961 *et. seq.* and 18 U.S.C. Section 1962(c), *Racketeer Influenced and Corrupt Organization Act*, as well as, others *causes of actions*, and are complaining of the above captioned named Defendant(s) (Collectively, "*the Defendants*") of their unlawful "*Money-Laundering Scheme*"; which, Plaintiffs revealed. Thereafter, "**Faulkner**" and "**Umunna**" were put on a "**Hit List**" by "*the Defendants*". And, upon information and belief, excluding, factual

statement(s), the Plaintiffs state the followings:

I. Brief Background of Plaintiffs' Verified Complaint filings:

2. On February 19, 2016, Plaintiffs filed their original verified complaint.
3. On May 12, 2016, Plaintiffs filed for amending verified complaint to be heard on June 14, 2016 before the Honorable John W. Darrah. On June 10, 2016 the Honorable John W. Darrah granted Plaintiffs' to amend their verified complaint on or before July 11, 2016. Plaintiffs filed their amended verified complaint on July 11, 2016.
4. On December 28, 2016 Plaintiffs request for a Second Amended of their verified complaint; due to, Defendant(s) motions to Dismiss Plaintiffs' Amended Verified complaint as being a State adjudicated issues; which, the Plaintiffs' Amended Verified Complaint of case number: 1:16-cv-02432 is not of a State adjudicated matter; but, is a Federal matter that had not been adjudicated. On March 07, 2017 the Honorable Darrah allowed amending of the amended verified complaint filed herein on December 28, 2016; due on April 04, 2017, then later, extended on or about March 07, 2017 to be due on April 24, 2017 by the Honorable judge Edmond E. Chang.

II. JURISDICTION AND VENUE:

5. This Plaintiffs' *Civil-Rico* actions are brought pursuant to and under *18 U.S.C. §1961 et. seq.* and *18 U.S.C. Section 1962(c)* (RICO), and pursuant to sections: 1952 (Racketeering); 1956(Laundering of Monetary Instruments); 1957(Property Derived for Specified Unlawful Activity); 1344(Financial Institution Fraud); 1503(Obstruction of Justice); 1341(Mail Fraud); 1513(Retaliating against Victim(s)...).
6. This Court has supplemental jurisdiction over Plaintiffs' State Law Claims under *28 USC §1367* as these claims are intricately related to Plaintiffs' RICO claim and other

counts and form part of the same case or controversy.

7. This Court has jurisdiction of the claim herein pursuant to *18 USCA §1964(c)* and *28 USCA §1331*. This civil action arises under the laws of the United States. Plaintiffs are alleging violations of their rights under Title IX of the Organized Crime Control Act of 1970, as amended, *18 USCA §§1961 et seq.*

8. This action is also brought pursuant to 42 U.S.C. §1983 to redress the deprivation *under color of law* of Plaintiffs' rights as secured by the United States Constitution deprivation of Faulkner's and Umunna's Constitutional Rights'; Federal and State Law.

9. Although, judicial officers are accorded absolute immunity from suit for judicial acts, "immunity does not reach so far as to immunize criminal conduct proscribed by an Act of Congress," *O'Shea v. Littleton*, 414 U.S. 488, (1974), citing *Gravel v. United States*, 408 U.S. 606, (1972).

10. The U.S. Supreme Court, in *Scheuer v. Rhodes*, 416 U.S. 232, 94 S. Ct. 1683, 1687 (1974) stated that: "when a state officer acts under a State Law in a manner violative of the Federal Constitution, he "comes into conflict with the superior authority of that Constitution, and he is in that case stripped of his official or representative character and is subjected in his person to the consequences of his individual conduct. The State has no power to impart to him any immunity from responsibility to the supreme authority of the United States".

11. *18 U.S. Code Section 4* – "Whoever, having knowledge of the actual commission of a felony cognizable by a court of the United States, conceals and does not as soon as possible make known the same to some Judge or other person in civil or military authority under the United States, shall be fined under this title ...". And,

12. *Article 6, Clause 2 of the U.S. Constitution* - "...under the Authority of the United States, shall be the supreme Law of the Land; and the Judges in every State shall be bound thereby, anything in the Constitution or Laws of any..."

13. Venue is proper in this district pursuant to 28 U.S.C. §1391 (e) (1) and (2), because a substantial part of the events giving rise to this claim occurred in this District in which one or more Defendant(s) is/are officer or employee of the United States; or any agency thereof acting in his *official capacity* or *under color of legal authority*; or an agency of the United States or the United States, may, except as otherwise provided by law, be brought in any Judicial District pursuant to 28 U.S.C. §1391 (e) (1) and (2).

14. Venue is proper in the United States District Court for the Northern District of Illinois, Eastern Division pursuant to 28 U.S.C. §1391; because, the unlawful conduct alleged herein was committed and continues to occur within the boundaries of the Northern District of Illinois, Eastern Division. Defendant(s) have operated, and continue to operate, an ongoing enterprise engage in "*Money Laundering Scheme*" which has existed for over seven years and they operate the enterprise by a continuous, systematic pattern of racketeering activity which has defrauded numerous by Extrinsic and Intrinsic Fraud perpetrated against the Plaintiff and participants in this District is substantially identical to the fraud perpetrated on the U.S. citizens.

15. Venue is proper in this court under 18 USCA §1965(a-d) and 28 USCA §§1391 because:

a. Defendants reside, are found, have an agent, or transact his/her/its affairs and/or works here in this District.

16. This Court has jurisdiction over the subject matter of this action pursuant to 28 U.S.C Section 1331 and 18 U.S.C Section 1961-66, 68.

17. This case arises under 28 U.S.C. §1332, between the Plaintiff and the Defendant(s), through their express agent(s), have engaged in extensive and systematic conduct in this District with the intended purpose of defrauding Plaintiff exceeding of Four Million Nine Hundred Five Thousand Seven Hundred Seventy-One Dollars and Eight-Seven Cents (\$4,905,771.87).

III. PARTIES:

A. PLAINTIFF(S) :

18. **Marvin Faulkner** *Plaintiff*, is a citizen of the United States, and is a resident of the State of Illinois.

19. **Samuel C. Umunna**, *Plaintiff*, is a citizen of the United States, and is a resident of the State of Illinois.

B. DEFENDANT(S) :

20. **ANNA M. LOFTUS ("Loftus")**, is a served *Standing Defendant*, (Loftus is a Judge in the State of Illinois who rescued herself from plaintiff's Faulkner's case(s) after Faulkner filed causes of her impropriety, Loftus is purported: to be one of the directors of the enterprise of the "Money Laundering Scheme; of Wire fraud; is receiving unlawful payouts and is conducting Extrinsic Fraud among many. Loftus is a citizen of the United States, and is a resident of the State of Illinois. [*Defendant Loftus is being sued in her Official and/or Individual capacity*].

21. **WILLIAM FARROW ("Farrow")**, is a served *Standing Defendant*, believed to be one of the creator of "Money Laundering Scheme" is a citizen of the United States,

and is a resident of the State of Illinois. [*Defendant Farrow is being sued in his Official and/or Individual capacity*].

22. **PIERCE & ASSOCIATES (“*Peirce*”)**, is a served *Standing Defendant* (Pierce is a law firm in the States of Illinois, Michigan, Atlanta, South Carolina... who files and manage complaint on behalf of the Bank, for ill-gotten gains, using close relationships with judiciaries and is actively being charged with RICO); it is an active for-profit corporation whose is existing under and by virtue of the United States of America’s laws and laws of the State of Illinois.

23. **FEDERAL DEPOSIT INSURANCE CORPORATION (“*FDIC*”)**, is a served *Standing Defendant*, believed to be one of the creators of “Money Laundering Scheme” is a corporation existing under and by virtue of the laws of the United States.

24. **URBAN PARTNERSHIP BANK (“*UPB*”)**, is a served *Standing Defendant*, believed to be one of the creator of “Money Laundering Scheme” is a corporation exist doing business under and by virtue of the laws of the State of Illinois; State of Michigan and the State of Ohio.

25. **SHOREBANK (“*ShoreBank*”)**, is a served *Proximate Cause Defendant*, believed to be one of the creator of “Money Laundering Scheme” is a corporation existing under and by virtue of the laws of the State of Illinois; State of Michigan and the State of Ohio.

26. **CHUHAK & TECSON P.C., (“*C&T*”)**, is a served *Standing Defendant*, believed to orchestrating documents of misrepresentation to facilitate the racketeering activities is a corporation existing under and by virtue of the laws of the State of Illinois.

27. **MICHAEL A. EURICH (“*Eurich*”)**, is a served *Standing Defendant*, believed to

orchestrating documents of misrepresentation to facilitate the racketeering activities is a citizen of the United State, and is a resident of the State of Illinois. *[Defendant Eurich is being sued in his Official and/or Individual capacity]*.

28. **VILLA CAPITAL PROPERTIES ("VCP")**, is a served *Standing Defendant*, is a corporation existing under and by virtue of the laws of the State of Illinois.

29. **GEORGE F. SCULLY JR. ("Scully")**, is a served *Standing Defendant*, is a citizen of the United States, and is a resident of the States of Illinois. *[Defendant Scully is being sued in his Official and/or Individual capacity]*.

30. **ELIZABETH LYONS ("Lyons")**, is a served *Proximate Cause Defendant*, believed to misrepresentation official business to facilitate the racketeering activities is a citizen of the United States, and is a resident of the States of Illinois. *[Defendant Lyons is being sued in her Official and/or Individual capacity]*.

31. **DARRLY B. SIMKO ("Simko")**, is a served *Standing Defendant*, is a citizen of the United States, and is a resident of the States of Illinois. *[Defendant Simko is being sued in his Official and/or Individual capacity]*.

32. **CITY OF CHICAGO ("CHICAGO")**, is a served *Standing Defendant*, is a metropolitan; govern by the State of Illinois.

33. **ALFRED M. SWANSON JR. ("Swanson Jr.")**, is a served *Standing Defendant*, is a citizen of the United States, and is a resident of the States of Illinois. *[Defendant Swanson is being sued in his Official and/or Individual capacity]*.

34. **LASALLE BANK NATIONAL, ("LaSalle Bank")**, is a served *Standing Defendant* (LaSalle Bank is an active banking institution, a Federal Deposit Insurance Corporation (FDIC) affiliate, in the United States during business in the States of Illinois,

Michigan, Indiana... to further the enterprise of the "*Money Laundering Scheme*", making unlawful and illicit payouts and is active within the enterprise, herein); it is an active for-profit corporation whose principal place of business exists under and by virtue of the laws of the United States of America Laws and of the State of Illinois.

35. **MORTGAGE ELECTRONIC REGISTRATION SYSTEMS ("MERS")**, is a served *Standing Defendant*, is a corporation existing under and by virtue of the laws of the State of Illinois.

36. **ENCORE CREDIT ("Encore")**, is a served *Standing Defendant*, believed to be one of the creator of "Money Laundering Scheme" is a corporation existing under and by virtue of the laws of the State of Illinois.

37. **EMC MORTGAGE CORPORATION ("EMC")**, believed to be one of the creator of "Money Laundering Scheme" is a served *Standing Defendant*, is a corporation existing under and by virtue of the laws of the State of Illinois.

38. **BEAR STEARNS ASSET BACKED SECURITIES I LLC ("Bear Stearns")**, is a served *Standing Defendant*, is a corporation existing under and by virtue of the laws of the State of Illinois.

39. **NATIONSTAR MORTGAGE LLC. ("Nationstar")**, believed to be one of the creator of "Money Laundering Scheme" is a served *Standing Defendant*, is a corporation existing under and by virtue of the laws of the State of Illinois.

40. **CITIMORTGAGE, INC., ("Citimortgage")**, believed to be one of the creators of "Money Laundering Scheme" is a served *Standing Defendant*, is a corporation existing under and by virtue of the laws of the State of Illinois.

41. **BEAR STEARNS ASSET BACKED SECURITIES I TRUST 2007-HE6,**

(*"Bear Stearns-2007-HE6"*), is a served *Standing Defendant*, is a corporation existing under and by virtue of the laws of the State of Illinois.

42. **FEDERAL NATIONAL MORTGAGE ASSOCIATION (*"FNM"*)**, believed to be one of the creator of "Money Laundering Scheme" is a served *Standing Defendant*, is a corporation existing under and by virtue of the laws of the State of Illinois.

43. **FIRST FRANKLIN MORTGAGE (*"First Franklin"*)**, believed to be one of the creator of "Money Laundering Scheme" is a served *Standing Defendant*, is a corporation existing under and by virtue of the laws of the State of Illinois.

44. **US BANK NATIONAL ASSOCIATES (*"US Bank"*)**, is a severed *Standing Defendant* (US Bank is an active banking institution, a Federal Deposit Insurance Corporation (FDIC) affiliate, in the United States during business in the States of Illinois, Arizona, Arkansas, California, Colorado, Idaho, Indiana Nebraska, Nevada, Oregon, Tennessee, Utah... to further the enterprise of the "*Money Laundering Scheme*", illicit payouts and is active within the enterprise, herein); it is an active for-profit corporation whose principal place of business exists under and by virtue of the laws of the United States of America and the State of Illinois.

45. **MICHAEL N. VARAK (*"Varak"*)**; is a served *Standing Defendant*, (Varak is a practicing attorney in the State of Illinois, employed by Pierce & Associates they both are actively being charged with RICO; Varak is purported to being directed by Judge Loftus and Judge Sullivan; receiving unlawful payouts and is committing Mail Fraud and is active within the enterprise, herein); Varak is a citizen of the United States and resident of the State of Illinois. [*Defendant Pierce is being sued in his Official and/or Individual capacity*].

46. **BRYAN GOMEZ (“Gomez”)**, is a served *Standing Defendant*, believed to orchestrating documents of misrepresentation to facilitate the racketeering activities is a citizen of the United States, and is a resident of the State of Illinois. *[Defendant Gomez is being sued in his Official and/or Individual capacity]*.

47. **KOVITZ, SHIFRIN & NESBIT LAW OFFICE (“KS&N”)**, is a served *Standing Defendant*, believed to orchestrating documents of misrepresentation to facilitate the racketeering activities is a corporation existing under and by virtue of the laws of the State of Illinois.

48. **MEREDITH FREEMAN (“Freeman”)**, is a served *Standing Defendant*, believed to orchestrating documents of misrepresentation to facilitate the racketeering activities is a citizen of the United States, and is a resident of the State of Illinois. *[Defendant Freeman is being sued in his Official and/or Individual capacity]*.

49. **EDWARD J. LESNIAK (“Lesniak”)**, is a served *Standing Defendant*, believed to orchestrating documents of misrepresentation to facilitate the racketeering activities is a citizen of the United States, and is a resident of the State of Illinois. *[Defendant Lesniak is being sued in his Official and/or Individual capacity]*.

50. **ALEXANDER D. MARKS (“Marks”)**, is a served *Standing Defendant*, believed to orchestrating documents of misrepresentation to facilitate the racketeering activities is a citizen of the United States, and is a resident of the State of Illinois. *[Defendant Marks is being sued in his Official and/or Individual capacity]*.

51. **PAMELA MCLEAN MEYERSON (“Meyerson”)**, is a served *Standing Defendant*, is a citizen of the United States, and is a resident of the State of Illinois. *[Defendant Meyerson is being sued in her Official and/or Individual capacity]*.

52. **BURKE, WARREN, MACKAY & SERRITELLA, P.C.; (*BWM&S*)**, is a served *Standing Defendant*, is a corporation existing under and by virtue of the laws of the State of Illinois.

53. **CHRISTINA PLACE II CONDOMINIUM ASSOCIATION (“*Christina Place II*”)**, is a served *Standing/ Proximate Cause Defendant*, is a corporation existing under and by virtue of the laws of the State of Illinois.

54. **RAYMOND W. MITCHELL (“*Mitchell*”)**, *Standing Defendant*, is a served citizen of the United State, and is a resident of the State of Illinois. [*Defendant Mitchell is being sued in his Official and/or Individual capacity*].

55. **IRWIN J. SOLGANICK (“*Solganick*”)**, is a served *Standing Defendant*, is a citizen of the United States, and is a resident of the State of Illinois. [*Defendant Solganick is being sued in his Official and/or Individual capacity*].

56. **ALEXANDER P. WHITE; (“*White*”)**, is a served *Standing Defendant*, is a citizen of the United States, and is a resident of the State of Illinois. [*Defendant White is being sued in his Official and/or Individual capacity*].

57. **TIMOTHY L. ROWELL (“*Rowell*”)**, is a served *Standing Defendant*, believed to orchestrating documents of misrepresentation to facilitate the racketeering activities is a citizen of the United States, and is a resident of the State of Illinois. [*Defendant Rowell is being sued in his Official and/or Individual capacity*].

58. **STARR, BEJGIET, ZINK & ROWELL (“*SBZ&R*”)**, is a served *Proximate Cause Defendant*, is a corporation existing under and by virtue of the laws of the State of Illinois.

59. **CODILIS & ASSOCIATES: (“*Codilis*”)**, is a served *Standing Defendant*, is a

corporation existing under and by virtue of the laws of the State of Illinois.

60. **COOK COUNTY SHERIFF'S POLICE DEPARTMENT;** ("**Cook County Sheriff's**"), is a served *Proximate Cause Defendant*, is an active Governmental Law Enforcement Agency, and is liable for and of its' employees, including, Roderick Pierce, who is a Standing Defendant, with the Cook County Sheriff's and is a corporation existing under and by virtue of the laws of the State of Illinois.

61. **SONIA PASQUESI;** ("**Pasquesi**"), is a served *Standing Defendant*, believed to orchestrating documents of misrepresentation to facilitate the racketeering activities is a citizen of the United States, and is a resident of the State of Illinois. [*Defendant Pasquesi is being sued in his Official and/or Individual capacity*].

62. **JOHN AVGERINOS ("J. Avgerinos");** *Standing Defendant*, an agent of the Rico actors is a citizen of the United States, and is a resident of the State of Indiana. [*Defendant J. Avgerinos is being sued in his Official and/or Individual capacity*].

63. **PAUL AVGERINOS ("P. Avgerinos");** *Standing Defendant*, an agent of the Rico actors; is a citizen of the United States, and is a resident of the State of Indiana. [*Defendant P. Avgerinos is being sued in his Official and/or Individual capacity*].

64. **SAMANTHA L. BABCOCK ("Babcock");** is a served *Standing Defendant*, believed to orchestrating documents of misrepresentation to facilitate the racketeering activities is a citizen of the United States, and is a resident of the State of Illinois. [*Defendant Babcock is being sued in his Official and/or Individual capacity*].

65. **ERIK HUBBARD ("Hubbard");** is a served *Standing Defendant*, an agent of the Rico actors; is a citizen of the United States, and is a resident of the State of Illinois. [*Defendant Hubbard is being sued in his Official and/or Individual capacity*].

66. **HAUSELMAN, RAPPIN & OLSWANG, LTD (“HR&O”)**, is a served *Standing Defendant*, believed to orchestrating documents of misrepresentation to facilitate the racketeering activities is a corporation existing under and by virtue of the laws of the State of Illinois.

67. **RODERICK PIERCE (“Pierce”)**, is a severed *Standing Defendant*, Pierce employed by the Cook County Sheriff’s Police Department, is an active Government Law Enforcement Agency, who is purported to be directed by the Circuit Court Judge; including Judge Loftus; Judge Simko; Judge Meyerson; Judge Mitchell and several other Circuit Court Judiciaries; and is active within the enterprise, herein); Pierce is a citizen of the United States, and is a resident of the State of Illinois. [*Defendant Pierce is being sued in his Official and/or Individual capacity*].

IV. DEFENDANTS/AGENTS:

68. Defendants were and are engaged in a conspiracy to defraud and each of them is liable for the actions of the other as if they themselves had committed the acts. All Defendants were acting as the agents of the others with either express or implied authority to so act in furtherance of their common goal to operate a RICO enterprise and all Defendants benefitted financially (ill-gotten gains) therefrom and ratified the acts of the others. Therefore, all defendants are jointly and severally liable for the actions of every other Defendant(s) committed in furtherance of the conspiracy.

69. All Municipal Governmental entities and/or entities, Defendant(s), herein (*unless, expressly, excluded by plaintiff(s)*) are being sued and is responsible and can be held liable for its wrongful/illegal acts and that of its officers, directors, employees, agents, and/or shareholders and was acting “under the color of law” in the State of Illinois; of its

authority, regulations, customs, and usage's and in violation of the Constitution, Federal, States and Local laws.

70. All individual Defendants herein (*as expressly, included by the plaintiff(s)*) are being sued in their official and individual capacities and are responsible and can be held liable for his/her wrongful acts regarding and in relation to himself/herself, his/her employees and agents and was acting "under the color of law" in the State of Illinois; of its authority, regulations, customs, and usage's and in violation of the Constitution, Federal, States and Local laws.

**V. SUMMARY OF PLAINTIFF'S SECOND
VERIFIED COMPLAINT-CIVIL RICO:**

71. This is a Civil-RICO complaint by Plaintiffs, Marvin Faulkner and Samuel C. Umunna titled: "*Plaintiffs' Second Amended Verified Complaint-Civil Rico*", with Federal Questions; stating that because, Plaintiffs have revealed the "Money Laundering Scheme" of the Defendant(s); of Banks and the Banks' actors to obstruct justice to receive ill-gotten gains (*unlawful payouts*) who are actively participating in racketeering activities and continual harm to Plaintiff Marvin Faulkner and Plaintiff Samuel C. Umunna (*e.g.* Judge Loftus stating to Faulkner: "**Nigger, I'm going to enjoy destroying you**"); placing Faulkner and Umunna on a "Hit List" to destroy; deprive and swindle millions of dollars from Faulkner and Umunna; by, using their authority under the color of law by the purported actors: banks; law firms; lawyers; judiciaries and others/their agents of *Conspiracy, Extrinsic Fraud, Mail fraud, Intimidation and Emotional Distress*; the backlash, against Faulkner and Umunna whom have exposed the Defendant(s) "Money Laundering Scheme" to/that cleaned/legitimized breach mortgages by the banks through mortgage foreclosures, which are prosecutable against the banks, from the years

of 2007 until 2017 [e.g. Federal Housing Finance Agencies: Fannie Mae; Freddie Mac and Federal Deposit Insurance Corporation (FDIC); Urban Partnership Bank; LaSalle Bank Nation; US Bank National Associates; etc...] that were/are executed by the Defendant(s) for the purpose to recycle illicitly/fraudulently mortgages to favor Banks. In turns, the Defendant(s) have violated Marvin Faulkner's and Samuel C. Umunna's Constitutional Rights, as well as, violating the 2nd, 4th, 5th and 14th Amendments Rights among others rights of Faulkner's and/or Umunna's. Faulkner and Umunna, alleges counts: **(1).** *Rico* under *18 U.S.C. §1961 et. seq.* and *18 U.S.C. Section 1962(c)* (RICO); **(2).** *18 U.S.C. §242*; **(3).** *Intentional Infliction of Emotional Distress*; **(4).** *Intimidation*; **(5).** *Unjust Enrichment*; **(6).** *Intentional Tort*; **(7).** *Hate Crime*; **(8).** *§1985 (3) Deprivation*; **(9).** *§1986-Conspiracy*; **(10).** *Pierced Corporate Veil* and **(11).** *42 U.S.C. §1983 not counting*; related claims that arises in this matter at bar against the Defendant(s). Faulkner and Umunna, separately and/or jointly, are seeking actual damages of each count against each Defendant, along with, compensatory damages; treble damages; punitive damages that are applicable under the law.

**V. BREIF BACKGROUND OF THIS
SECOND AMENDED COMPLAINT:**

72. Plaintiff, under a Pro Se Complaint must be construed liberally and is, "held to a less stringent standards than formal pleadings drafted by lawyers." *Erickson v. Pardus*, 551 U.S. 89, 94, 127 S.Ct. 2197, 2200 (2007) (citations omitted).

72A. -On March 06, 2017, within Judge John W. Darrah's Memorandum Opinion and Order, of five (5) pages, in case number 1:16-cv-02432

ordering that: "Plaintiffs' Amended Verified Complaint is dismissed without prejudice. Plaintiffs are granted leave to amend, if they can do so in strict compliance with the letter and spirit of Rule 8 and pursuant to Rule 11, within thirty days of this Order."

72B. -On March 13, 2017 filed at 10:45 am but entered at 1:46 pm in case number 1:16-cv-02432 Plaintiffs, Marvin Faulkner and Samuel C. Umunna, filed an emergency motion titled: "Plaintiff(s)', Emergency Motion for Leave from This Court, That plaintiffs Are Allowed To Dismiss and/or Add Defendant(s), and Withdraw and/or Add Count(s) To Plaintiffs' Second Amended Verified Complaint At Law".

72C. -On March 13, 2017 "The following transaction was entered on 3/13/2017 at 11:20 PM in case number 1:16-cv-02432 CDT and filed on 3/13/2017[sic]" a four (4) page order titled: "Order" by the Honorable Edmond E. Chang who extended the deadline for filing the Second Amended Complaint to 04/24/2017; but, did not allow Plaintiffs to add Defendant(s) and/or add Count(s). However, the Honorable Edmond E. Chang did allow Plaintiffs to withdraw Defendant(s) and/or withdraw Count(s).

72D. -On March 13, 2017 at 3:58 pm in case number 1:16-cv-02432, an Executive Committee Order: Case reassigned to the Honorable Edmond E. Chang for all further proceedings. Signed by Executive Committee on 3/13/2017. (eaa,).

72E. -On March 15, 2017 at 2:29 pm in case number: 1:16-cv-02432 Docket

Text: "Minute entry before the Honorable John W. Darrah: ALL dates before Judge Darrah are vacated. Mailed notice (maf)".] (Emphasis Added).

72F. "Dealing with claims of "immunity." Is a fraud because, if valid, it would prevent removal from office for crimes against the people, which removal is authorized or even mandated under U.S. Constitution Article 2, Section IV; as well as 18 USC 241, 42 USC 1983, 1985, 1986, and other state Constitutions. Precedents of Law established by **COURT** cases, which are in violation of law, render violations of law legally unassailable. Such a situation violates several specifically stated intents and purposes of the Constitution set forth in the Preamble; to establish justice, insure domestic tranquility, and secure the blessings of liberty. This is for **JUDGES**, or anyone in any branch of government SEVEN ELEMENTS OF JURISDICTION: ..."

VI. RELEVANT FACTS,
UPON WHICH RELIEF IS BEING SOUGHT:

73. On July 11, 2016, Plaintiffs: Marvin Faulkner and Samuel C. Umunna filed their "AMENDED VERIFIED COMPLAINT" ("AVC") IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION case number: 16-cv-2432 which stated (*In parts*):

74. [In Plaintiffs' "AVC" paragraph #70, therein]; Plaintiffs in this civil action, as alleged-herein, raised/arising, from the illicit scheme by the Defendant(s) to collectively and continuously attacks on Marvin Faulkner and Samuel C. Umunna for their aggressive filing of complaints and law suits against the illicit behavior and activities of banks, judges, law firms, attorneys and individuals who illegally wronged Marvin Faulkner, Samuel C. Umunna and others connected with Faulkner and Umunna; that, the

defendant(s) under color of law are at issue with the followings:

(a). The Defendant(s) has/have great power and authority over/than Marvin Faulkner and Samuel C. Umunna, the Plaintiffs. And, that the defendant(s) is/are illicitly, under color of law, using their power and authority to harm Marvin Faulkner and Samuel C. Umunna; as set forth.

(b). The Defendant(s) has/have great power and authority over/than the Marvin Faulkner and Samuel C. Umunna and are continuously in using their power/authority to harm Marvin Faulkner and Samuel C. Umunna with intimidation, detainment, emotional distress, depletion of Plaintiffs' funds, vexatious litigations; but, not limited to the above.

(c). [In Plaintiffs' "AVC" paragraph #71, therein]: Plaintiffs will and/or have continued to legally fight back against the Defendant(s), to protect Plaintiffs' Constitutional Rights and Federal, State and Locals' Laws against banks, judges, law firms, attorney and individuals to protect themselves and their properties from the illicit and unlawful racketeering activities of Defendant(s): ANNA M. LOFTUS; WILLIAM FARROW; PIERCE & ASSOCIATES; FEDERAL DEPOSIT INSURANCE CORPORATION; URBAN PARTNERSHIP BANK; SHOREBANK; JENNER & BLOCK LLP; CHUHAK & TECSON, P.C.; MICHAEL A. EURICH; VILLA CAPITAL PROPERTIES; GEORGE F. SCULLY JR.; ELIZABETH LYONS; DARRLY B. SIMKO; CITY OF CHICAGO; ALFRED M. SWANSON JR.; LASALLE BANK NATIONAL, as trustee for Certificate holders of Bear Stearns Asset Back Securities I, LLC, Asset-Backed; Certificates, Series 2007-HE6; MORTGAGE ELECTRONIC REGISTRATION SYSTEMS; ENCORE CREDIT; EMC MORTGAGE

CORPORATION; BEAR STEARNS ASSET BACKED SECURITIES I LLC; NATIONSTAR MORTGAGE, LLC; CITIMORTGAGE, INC.; BEAR STEARNS ASSET BACKED SECURITIES I TRUST 2007-HE6; FEDERAL NATIONAL MORTGAGE ASSOCIATION; FIRST FRANKLEN MORTGAGE; US BANK NATIONAL ASSOCIATES; MICHAEL FRANCIS OTTO; MICHAEL N. VARAK; BRYAN GOMEZ; KOVITZ, SHIFRIN & NESBIT LAW OFFICE; MEREDITH FREEMAN; EDWARD J. LESNIAK; ALEXANDER D. MARKS; PAMELA MCLEAN MEYERSON; BURKE, WARREN, MACKAY & SERRITELLA, P.C.; CHRISTINA PLACE II CONDOMINIUM ASSOCIATION; RAYMOND W. MITCHELL; IRWIN J. SOLGANICK; ALEXANDER P. WHITE; TIMOTHY L. ROWELL; STARR, BEJGIERT, ZINK & ROWELL; CODILIS & ASSOCIATES; COOK COUNTY SHERIFF'S POLICE DEPARTMENT; SONIA PASQUESI; JOHN AVGERINOS; PAUL AVGERINOS; SAMANTHA L. BABCOCK; ERIK HUBBARD; HAUSELMAN, RAPPIN & OLSWANG, LTD and RODERICK PIERCE (*i.e.*, Collectively, "*the Defendant(s)*" or "*the Defendants*").

75. Plaintiffs are alleging that the Defendant(s) together or for the purpose of the Defendant(s)' illicit enterprise; including, certain not yet named Defendant(s) ("Doe") of Banks; Judges; agents of co-conspirators and aiders and abettors that are engaged and/or are engaging in State Common Law Fraud; Federal Statutes and State Statutory Criminal Fraud, thereby and herein, damaging to Plaintiff Faulkner and Plaintiff Umunna.

76. William Farrow (owner/president of failed ShoreBank) a creator of Urban Partnership Bank (UPB) prior to August of 2010; under/or with the direction of William Farrow, ShoreBank filed for chapter 11 bankruptcy protections. Within, 20 days of

ShoreBanks' filed chapter 11 bankruptcy, William Farrow and Federal Deposit Insurance Corporation (FDIC, receiver of ShoreBanks' assets) violation of §1962(c); as set forth in whole, herein of the causes of action, that commenced from a *behind closed doors deals*, with *unclean hands*, in a short bidding process, only allowing UPB to bid on the liquidation of Bankrupted ShoreBank assets, a Community-Development bank in Chicago, Cleveland and Detroit. The FDIC subsequently **sold** ShoreBanks' assets to UPB -William Farrow, the ShoreBank president and creator of the new institution called Urban Partnership Bank. This move was *unusual* for the FDIC, which usually bars investors who own more than 10% of the failed bank from bidding on its assets.

77. On August 20, 2010, William Farrow, entered into an agreement with the FDIC through Urban Partnership Bank, titled: "PURCHASE AND ASSUMPTION AGREEMENT WHOLE BANK ALL DEPOSITS AMONG FEDERAL DEPOSIT INSURANCE CORPORATION, RECEIVER OF SHOREBANK, CHICAGO, ILLINOIS FEDERAL DEPOSIT INSURANCE CORPORATION and URBAN PARTNERSHIP BANK, CHICAGO, ILLINOIS DATED AS OF AUGUST 20, 2010" (Also, herein, known as the "August 20, 2010 Agreement"). William Farrow and Urban Partnership Bank were assured of no outside bidder of the assets of ShoreBank by the FDIC.

78. Federal Deposit Insurance Corporation on August 20, 2010 knowingly entered into a Purchase and Assumption Agreement titled: ("WHOLE BANK ALL DEPOSITS among FEDERAL DEPOSIT INSURANCE CORPORATION, RECEIVER OF SHOREBANK, CHICAGO, ILLINOIS FEDERAL DEPOSIT INSURANCE CORPORATION and URBAN PARTNERSHIP BANK, CHICAGO, ILLINOIS

DATED AS OF AUGUST 20, 2010”) with William Farrow, ShoreBank president and creator of Urban Partnership Bank with unclean hands.

79. The FDIC received in access of \$8.5 million to settle a claim from its receivership of Shorebank and to distribute Shorebank’s remaining assets to other creditors, believed to be UPB.

a). William Farrow was instrumental in assuring payment in access of \$8.5 million to the FDIC to settle a claim from its receivership of Shorebank and to distribute Shorebank’s remaining assets. The FDIC was well aware that William Farrow had strong connection with ShoreBank, with more than 10% of failed Shorebank in bidding on its assets.

80. The Federal Deposit Insurance Corporation filed a Federal Complaint, case number 13-cv-05888 against named defendants; therein,: Drexel Amy; Olga v. Lakes-Battle; James Bringley, Eric Rader and Thurman Smith, five officers of ShoreBank in case number 13-cv-05888 In The United States District Court For The Northern District Of Illinois, Eastern Division, pursuant to 12 U.S.C. §1821 authority granted to the FDIC.

81. The Federal Deposit Insurance Corporation claimed and seeks to recover more than \$73 million, that, the five former ShoreBank’s officers acted negligently and grossly negligently and breached their fiduciary duties by disregarding the Bank’s loan policy, underwriting guidelines and prudent lending practices during loans approved between December of 2005 and June of 2009 acted and omissions that given rise to the Defendants’ liabilities include, but are not limited to the followings:

(i). failing to obtain borrower and guarantor financial information;

- (ii). Relying on outdated, unverified, and inadequate financial information for borrowers and guarantors;
- (iii). Failing to perform and/or ensure that global cash flow analyses were performed prior to loan approval;
- (iv). Failing to properly assess the repayment ability of borrowers and/or guarantors;
- (v). failing to ensure that loans were secured by sufficient collateral;
- (vi). extending credit in excess of permitted loan-to-value ("LTV") ratio limits;
- (vii). Approval of loans in excess of individual approval authority and without proper committee approval;
- (ix). approving loans without adequate documentation;
- (x). permitting debt service coverage ratios ("DSCR") below minimum requirements.

81. Pursuant to *12 U.S.C. §1821* the FDIC was granted authority as Receiver (as Receiver for the bank by the Illinois Department of Financial and Professional Regulation – Division of Banking ("IDFPR") on August 20, 2010. Pursuant to *12 U.S.C. §1821(d)(2)(A)(i)*, the FDIC succeeded to all rights, titles, powers, and privileges of the Bank and the Bank's shareholders, account-holders, and depositors. *FDIC* without restriction though "Limited Power of Attorney" gave *UPB* full authority to execute on behalf of the *FDIC* under applicable resolutions of the FDIC's board of directors and re-delegation, therein. *FDIC*; as well as error against Samuel C. Umunna and Marvin Faulkner properties, who relied on the fiduciary relation of the FDIC against any and all wrongs:

a). *FDIC* failed to protect plaintiff's Umunna's rights and *FDIC* should have restricted *UPB* authority of *ShoreBanks'* assets from the *unclean hands* of the mortgages obtained by *ShoreBank* that caused harm to Samuel C. Umunna and Marvin Faulkner.

b). *FDIC failed* to secure/protect Samuel C. Umunna's and Marvin Faulkner's interest in the properties within ShoreBanks' filed Chapter 11 Bankruptcy.

c). *FDIC failed* to oversee UPB in modifying of Samuel C. Umunna's and Marvin Faulkner's properties-pursuant the "*August 20, 2010 Agreement*" which all of the properties between Shorebank and Umunna were executed and mortgaged between the years of 2005-2009.

d). *FDIC failed* to ensure a fair execution of the August 20, 2010 Agreement between FDIC receiver of ShoreBank assets and UPB.

e). *FDIC* was aware that ShoreBank officers engaged in predatory lending and unfair lending practices; including, reverse redlining and did not correct ShoreBank's illicit and illegal lending practices against Samuel C. Umunna and Marvin Faulkner interest and their properties or directed UPB to modify any and all of Shorebank's mortgages between the period of 2005-2009.

82. Pursuant to the "*Articles of Agreement of 2013*" OWNERSHIP (Also, the "*Shares*") between Faulkner and Umunna of the Property/Instrument/Investments are:

a). 2950 West Monroe of Chicago, Illinois (*valued*: \$192,384.68); [Faulkner at 75% shares and Umunna at 25% shares per property/instrument/investments, above.]

b). 2954 West Monroe of Chicago, Illinois (*valued*: \$187,081.97); [Faulkner at 75% shares and Umunna at 25% shares per property/instrument/investments, above.]

c). 13239 South Baltimore of Chicago, Illinois (*valued*: \$111,037.81); [Faulkner at 75% shares and Umunna at 25% shares per property/instrument/investments, above.]

d). 11332 South Calumet of Chicago, Illinois (*valued*: \$149,613.50); [Faulkner at 75% shares and Umunna at 25% shares per property/instrument/investments, above.]

e). 12822 South Emerald Ave. of Chicago, Illinois (*valued*: \$149,868.81); [Faulkner at 75% shares and Umunna at 25% shares per property/instrument/investments, above.]

f). 828 N. Ridgeland Ave. Oak Park, Illinois (*valued*: \$880,955.50); [Faulkner at shares 100% shares per property/instrument/investments, above.]

g). 10141 South Crandon Ave. of Chicago, Illinois (*valued*: \$135,495.33); [Faulkner at 75% shares and Umunna at 25% shares per property/instrument/investments, above.]

h). 7739 South King Drive of Chicago, Illinois (*valued*: \$89,380.29); [Faulkner at 75% shares and Umunna at 25% shares per property/instrument/investments, above.]

i). 10736 South Vernon Ave. of Chicago, Illinois (*valued*: \$173,054.43); [Faulkner at 75% shares and Umunna at 25% shares per property/instrument/investments, above.]

j). 2946 West Monroe of Chicago, Illinois (*valued*: \$151,839.72); [Faulkner at 75% shares and Umunna at 25% shares per property/instrument/investments, above.]

k). 8206 South Honore of Chicago, Illinois (*valued*: \$141,729.37); [Faulkner at 75% shares and Umunna at 25% shares per property/instrument/investments, above.]

l). 1140 South Keeler of Chicago, Illinois (*valued*: \$266,925.10); [Faulkner at 75% shares and Umunna at 25% shares per property/instrument/investments, above.]

m). 1104-06 West 78th Street of Chicago, Illinois (*valued*: \$264,973.23); [Faulkner at 75% shares and Umunna at 25% shares per property/instrument/investments, above.]

n). 1437 West Howard of Chicago, Illinois (*valued*: \$927,996.43); [Faulkner at 75% shares and Umunna at 25% shares per property/instrument/investments, above.]

o). 10024 S. Morgan of Chicago, Illinois (*valued*: \$117,897.43); [Faulkner at 75% shares and Umunna at 25% shares per property/instrument/investments, above.]

p). 120 East 45th Street Unit #202 of Chicago, Illinois (*valued*: \$166,375.81); [Faulkner

at 75% shares and Umunna at 25% shares per property/instrument/investments, above.]

q). 129 North Pine Ave. Unit B of Chicago, Illinois 60624 (*valued*: \$250,284.70);

[Faulkner at 75% shares and Umunna at 25% shares per property/instrument/investments, above.]

r). 10739 South Cottage Grove Ave., Chicago, Illinois (*valued*: \$73,547.06); [Faulkner at 75% shares and Umunna at 25% shares per property/instrument/investments, above.]

s). 4824 West Monroe of Chicago, Illinois (*valued*: \$195,250.00); [Faulkner at 100% shares per property/instrument/investments, above.]

t). 2012 West 69th Place of Chicago Illinois (*valued*: \$165,000.00); [Faulkner at 100% shares per property/instrument/investments, above.] and

u). 2015 West 69th Place of Chicago Illinois (*valued*: \$115,080.70) [Faulkner at 100% shares per property/instrument/investments, above].

83. Urban Partnership Bank (**UPB**) filed Commercial Foreclosure Complaints on Non-Commercial Properties and to frustrate **Removal**, UPB perversely named the City of Chicago as Defendant, *in bad faith*, on Umunna's and Faulkner's properties listed below:

a). 2950 West Monroe of Chicago, Illinois 60612 under case #: 2012-CH-38239;

b). 2954 West Monroe of Chicago, Illinois 60612 under case #: 2012-CH-37389;

c). 13239 South Baltimore of Chicago, Illinois 60632 under case #:2012-CH-38240;

d). 11332 South Calumet of Chicago, Illinois 60628 under case #: 2014-CH-01156;

e). 12822 South Emerald Ave. of Chicago, Illinois 60628 under case #: 2012-CH- 40727;

f). 10141 South Crandon Ave. of Chicago, Illinois 60617 under case #:2012-CH-36572;

g). 7739 South King Drive of Chicago, Illinois 606 under case #: 2012-CH-38596;

h). 10736 South Vernon Ave. of Chicago, Illinois 60628 under case #: 2012-CH-38032;

- i). 2946 West Monroe of Chicago, Illinois 60612 under case #: 2012-CH-37391;
- j). 8206 South Honore of Chicago, Illinois 60620 under case #: 2012-CH-38034;
- k). 1140 South Keeler of Chicago, Illinois 60624 under case #: 2012-CH-38031;
- l). 1104-06 West 78th Street of Chicago, Illinois 60620 under case #: 2012-CH-44556;
- m). 1437 West Howard of Chicago, Illinois 60626 under case #: 2012-CH-38498;
- n). 10024 S. Morgan of Chicago, Illinois 60643 under case #:2012-CH-38033; *and*
- o). 10739 South Cottage Grove Ave., Chicago, Illinois 60628 under case #:
2012-CH-28852.

84. Urban Partnership Bank (*UPB*) abused the authority *under color of law* of the State of Illinois by fraud and filing Commercial Foreclosure Complaints on Non-Commercial Properties of Samuel C. Umunna's and Marvin Faulkner. UPB claimed with the authority given by *FDIC* by its "ENDORSEMENT AND ALLONGE TO PROMISSORY NOTE". UPB performed and executed Fraud and illicit commercial foreclosures on non-commercial properties that were aided and abetted by Defendant(s) listed below:

- (a). ANNA M. LOFTUS;
- (b). WILLIAM FARROW;
- (c). FDIC;
- (d). SHOREBANK;
- (e). PIERCE & ASSOCIATES;
- (f). CHUHAK & TECSON, P.C.;
- (g). MICHAEL A. EURICH;
- (h). VILLA CAPITAL PROPERTIES;

- (i). ELIZABETH LYONS;
- (j). DARRLY B. SIMKO;
- (k). ALFRED M. SWANSON JR.;
- (l). MEREDITH FREEMAN;
- (m). PAMELA MCLEAN MEYERSON;
- (n). BURKE, WARREN, MACKAY & SERRITELLA, P.C.;
- (o). COOK COUNTY SHERIFF'S POLICE DEPARTMENT;
- (p). SAMANTHA L. BABCOCK;
- (q). ERIK HUBBARD *and*
- (r). "DOE".

85. "ENDORSEMENT AND ALLONGE TO PROMISSORY NOTE is an agreement between *FDIC* and *UPB* which states in pertinent parts: "Pay to the order of Urban Partnership Bank, an Illinois banking corporation, as assignee of the Federal Deposit Insurance Corporation, as Receiver for ShoreBank, without warranty, representation or recourse of any kind, that certain note (Date of Note, at discovery) in the original principal amount (amount, at discovery) executed by Samuel Umunna. The FDIC hereby endorses and assigns the Note to Lender. This assignment is made without recourse, representation or warranty, express or implied, by the FDIC in its corporate capacity or as Receiver. All references in the Note to "Lender" shall mean and include Urban Partnership Bank".

86. An "ENDORSEMENT AND ALLONGE TO PROMISSORY NOTE", *dated in the year 2012*, were designed to protect themselves from Urban Partnership Bank acknowledges of Shore Bank's unclean mortgages as the FDIC noted later in case number: 13-cv-05888 IN THE UNITED STATES DISTRICT COURT FOR THE

NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION. And, pursuant to 12 U.S.C §1821(d)(2)(A)(i), the FDIC succeeded to all rights, titles, powers, and privileges of ShoreBank's and the ShoreBank's shareholders, account-holder, and depositors. FDIC without restriction though "Limited Power of Attorney" gave Urban Partnership Bank, full authority to execute on behalf of the FDIC under applicable resolutions of the FDIC's board of directors and re-delegation, therein.

87. That; the FDIC failed stop or impede foreclosure actions and to protect the rights of Samuel C. Umunna ; under the Mortgage and Note Agreement with ShoreBank. [As well as, Marvin Faulkner, 75% *Shares* of 25% *Shares* Samuel C. Umunna, was greatly harmed through the FDIC and William Farrow's, ShoreBank and Urban Partnership Bank illicit back-door and hidden deal, as fore mentioned]. FDIC should have restricted with supervision the authority they gave to UPB of the unclean Mortgages of ShoreBank's pursuant the "ENDORSEMENT AND ALLONGE TO PROMISSORY NOTE" on the below properties:

- a). 2950 West Monroe of Chicago, Illinois 60612 under case #: 2012-CH-38239;
- b). 2954 West Monroe of Chicago, Illinois 60612 under case #: 2012-CH-37389;
- c). 13239 South Baltimore of Chicago, Illinois 60632 under case #:2012-CH-38240;
- d). 11332 South Calumet of Chicago, Illinois 60628 under case #: 2014-CH-01156;
- e). 12822 South Emerald Ave. of Chicago, Illinois 60628 under case #: 2012-CH- 40727;
- f). 10141 South Crandon Ave. of Chicago, Illinois 60617 under case #:2012-CH-36572;
- g). 7739 South King Drive of Chicago, Illinois 606 under case #: 2012-CH-38596;
- h). 10736 South Vernon Ave. of Chicago, Illinois 60628 under case #: 2012-CH-38032;
- i). 2946 West Monroe of Chicago, Illinois 60612 under case #: 2012-CH-37391;
- j). 8206 South Honore of Chicago, Illinois 60620 under case #: 2012-CH-38034;

- k). 1140 South Keeler of Chicago, Illinois 60624 under case #: 2012-CH-38031;
- l). 1104-06 West 78th Street of Chicago, Illinois 60620 under case #: 2012-CH-44556;
- m). 1437 West Howard of Chicago, Illinois 60626 under case #: 2012-CH-38498;
- n). 10024 S. Morgan of Chicago, Illinois 60643 under case #:2012-CH-38033; and
- o). 10739 South Cottage Grove Ave., Chicago, Illinois 60628 under case #:
2012-CH-28852.

88. The Plaintiffs found corruption deeper than imagined of the "*Money Laundering Schemes*" by the Defendant(s). And, because of the plaintiffs uncovering of the Money Laundering Schemes Faulkner and Umunna were targets harmed and placed on a "*Hit List*" by Circuit Court Judges in Cook County Illinois.

89. The Plaintiff(s) have made the public aware of the corruption in our judicial system through particular individuals, as herein, this *Second Amended Verified Complaint* the Plaintiff(s) layout the Defendant(s) and their *ill-gotten gain* and continual attempts to stop Marvin Faulkner and Samuel C. Umunna from uncovering the corruption of the Defendant(s) and others as detailed, hereinafter. In addition; hereinafter, within the Plaintiffs' exposition of the occurrences from the year of 2008 until this "*Second Amended Verified Complaint-Civil Rico*" of the corruption by the defendant(s) and others conspirators in their corruption to harm and damage to Faulkner and Umunna.

90. In May of 2008; Crystal Ross a tenant at the address of 2012 West 69th Place First Floor Apartment, Chicago Illinois, 60636 (Rents at \$700.00 per month to owner and landlord Marvin Faulkner) told Faulkner and wrote an her affidavit stating that; a representative, who identified himself as a representative of Wells Fargo Bank, N. A. on several occasions, came to her resident to inform her that Marvin Faulkner was no longer

the owner of 2012 west 69th Place, and that immediately to stop any and all payments of rents to Marvin Faulkner. The representative also stated that Wells Fargo Bank will give Crystal Ross \$1,000.00 if she moves from 2012 West 69th Place First Floor Apartment of Chicago Illinois. Immediately Faulkner addressed the false claims of Wells Fargo Bank to Crystal Ross, to no prevail, tenant, Crystal Ross, due to Wells Fargo Bank's statements stopped making rent payments to Marvin Faulkner as of June of 2008.

91. Also, in May of 2008, tenant, Lillie Miller (Miller), who lived at 2012 West 69th Place, of the Second Floor Apartment, Chicago, Illinois 60636; (Rents at \$800.00 per month to owner and landlord Marvin Faulkner). Stated, that people from the mortgage company, came to her home at 2012 West 69th Place, Chicago, Illinois and were taken pictures of the house and others people actually came and spoke with Lillie Miller, telling Lillie Miller that Marvin Faulkner's property had been foreclosed. That Marvin Faulkner does not own 2012 West 69th Place, Chicago Illinois 60636. Lillie Miller called Faulkner and told Faulkner about the people from the mortgage company. Faulkner then told Miller that he is the owner of said property and that the bank was just trying to make the tenants stop paying rents; so that the landlords could fall behind in their mortgages and then have a difficult to pay the mortgage and eventually lose the property. The bank continued to come and tell Miller that Faulkner did not own 2012 West 69th Place, and that Wells Fargo Bank was the owners, so Miller stopped paying rents to Faulkner. Miller sided with Wells Fargo Bank, stating that Faulkner was trying to trick her into paying him rent to a property Faulkner did not own. Miller told Faulkner to stop playing games; that the bank is the owners and not Faulkner of 2012 West 69th Place, Chicago, Illinois.

92. On September 03, 2008, Marvin Faulkner gave to Miller a "Five Day Notice". On November 17, 2008 and later filed for eviction under case number 2008-M1-728630. A ruling was entered in favor of Faulkner regaining possession of 2012 West 69th Place of Chicago, Illinois 60636 as of February 18, 2016 and onwards.

93. Faulkner addressed the courts of Wells Fargo Bank's false statements against Faulkner. However, the banks; including, Wells Fargo continued in their malice practice. Eventual, with no help from the courts Faulkner prevailed and received full ownership of the property known as 2012 West 69th Place, Chicago, Illinois; when Wells Fargo Banks were sued and found in corruption of mortgage fraud by the FDIC.

94. January of 2008, Tomeka Henry CHAC tenant of Marvin Faulkner at 2015 West 69th Place, Chicago Illinois 60636. (Renting at \$1,200.00 per month to owner and landlord Marvin Faulkner). [CHAC paid the majority of Tomeka Henry rents]. Tomeka Henry stated that people/representative from Fremont Investment Bank has on many occasions come to Henry home stating in January of 2008 and again around May of 2008 that Fremont Investment told Miss Henry that this property should be vacated and no one should be collecting rents on this property. For several months no payments of rents to Faulkner from Henry on January of 2009 Tomeka Henry moved out of 2015 West 69th Place, Chicago Illinois owing rent back rents of over \$10,000.00 leaving Faulkner extremely damaged of the acts of Fremont Investment Bank.

95. During 2008 Faulkner's experience of the issues at Chancery Court, aforementioned, upon motions to the Chancery Court's presiding judges by Faulkner, Faulkner made aware to the Court of the banks malicious practices and some judges were

uncomfortable to take action against the banks of Faulkner's claims.

a). Faulkner; therefore, took action in eviction court and that is when Faulkner learned that Pierce & Associates, U.S. Bank and Wells Fargo Bank were illicit in their practices in telling Faulkner's tenants to stop paying rents without a Judgment in their Mortgage Foreclosure Complaints.

b). The harm perpetrated against Faulkner by Pierce & Associates, U.S. Bank and Wells Fargo Bank were illicit in their practice in telling Faulkner's tenants to stop paying rents to Faulkner without a judgment of Foreclosure and Possession of the property by the court. Faulkner wanted to quick/give up any and all legal battles and abandon all of his the properties, but did not.

96. 7127 South Green Street, Chicago, Illinois where tenant, LaVonte Anthony Stewart (Stewart), lived from March 1, 2006 to January 2009 on June of 2008 LaVonte Anthony Stewart stopped paying his rent because a person from Pierce & Associates came to Mr. Stewart home on or about June 1, 2008 and told Stewart that U.S. Bank National Association is now the owner of 7172 South Green Street and not to pay any rents to Marvin Faulkner and Winifred Ihejirika with Stewart stopped paying rents.

97. In 2009, Faulkner became personally aggressively participatory in the legal process and released his attorneys to find out what had embolden the banks and their associates to have confident in the illicit practice and their trickery against or with their clients of their mortgages.

a). Prior in 2008 Marvin Faulkner and his wife Winifred Ihejirika was forced to modified their home Mortgage at 828 North Ridgeland Ave. Oak Park, Illinois 60302; due, to the malice and illegal practices of the banks stopping rental properties source of

income and ploy to defraud Faulkner by the bank.

98. In June of 2009; John Avgerinos (Father) and Paul Avgerinos (Son) [Together the Avgerinos] and Marvin Faulkner entered into a contract at 7342 S. Stony Island, Chicago Illinois. The contract amount was agreed at \$32,000.00 to finish a project; in which, different contractors left undone. The Avgerinos had agreed with Faulkner to supply the finishing material and produce all necessary permits for the project at 7342 South Stony Island of Chicago, Illinois. Due to non-payment by John Avgerinos and Paul Avgerinos, Marvin Faulkner stopped any and all further work on the project of 7342 South Stony Island of Chicago, Illinois until the Avgerinos' make current payments. Avgerinos asked Faulkner to help and invest into the project; Faulkner said "No." Avgerinos became very irate with Faulkner for not investing in the Avgerinos project.

99. Arising in 2011; John Avgerinos; Paul Avgerinos; Timothy L. Rowells; Starr, Bejgiert, Zink & Rowells and several Circuit Court judges and others: Judge Darryl B. Simko; Judge David B. Atkins; Attorney Bryan Gomez of Kovitz, Shifrin & Nesbit Law Office; Christina Place II Condominium Association among a few (together orchestrated a plot directed with others, aforementioned reviled to Faulkner by Timothy L. Rowells and *Whistleblowers*) to filed false complaints against Faulkner:

a). The first false complaint was a criminal complaint by the Avgerinos on April of 2010 claiming larceny of personal property [Where Marvin Faulkner was falsely arrested in the court room of Judge Gomolindki by two Chicago Police Detectives. Faulkner was warned of the Judges orchestrated ploy/framing of Faulkner for his aggressive litigation by attorney Bryant Gomez [Bryant Gomez, who generally and often boasts of him being

included and connection with Circuit Court's judges and the loyalty that they have one for another.] After a drilling court trial Faulkner prevailed and the Avgerinos were found incredible by the Criminal Court's proceedings.

b). On June 28, 2010; The Law office of Kovitz, Shifrin and Nesbit forward a letter to Marvin Faulkner via U.S. Mail titled: PRIVILEGED AND CONFIDENTIAL stating he following: RE: CHRISTINA PLACE II CONDOMINIUM ASSOCIATION V. SHAYNA ST. CLAIR, MARVIN AND ALL UNKNOWN OCCUPANTS. SUBJECT PROPERTY: 120 EAST 45TH ST., UNIT 2E, CHICAGO, IL. 60643. "Dear Mr. Faulkner: Please be advised that the above-captioned matter has been re-scheduled for hearing this coming Thursday, July 1, 2010, at 9:30 a.m. in room 1402 of the Richard J. Daley Center. Judge Gomolinski has requested that I provide you with this notice of the forthcoming hearing; Signed by Bryant Gomez." Also, attached with the letter from the Law Office of Kovitz, shifrin and Nesbit to Marvin Faulkner was an unsigned letter stating: "Marvin , Judge Gomolinski has Ruled Against You! It's over!!! Appearing in the right-hand lower portion of the that letter placed the number 870177.1. Also, the very same number (87017.1) appeared on the signed letter sent by Attorney Bryant Gomez of Kovitz, Shifrin and Nesbit. Faulkner confronted the exparte communication that Judge Gomolinski and Bryant Gomez had in violation of Illinois laws; when Faulkner confronted the issue of the exparte communication on July 1, 2010. Judge Gomolinski and attorney Gomez brushed it off by stating Attorney Gomez was before Judge Gomolinske on a different case not related to case number 2009-M1-718493; and, that due to Judge Gomoliski changing of the date from July 29, 2010 at 11:00 a.m. in room 1402 for hearing to July 01, 2010, at 9:30 a.m. in room 1402 [27 days earlier than

schedule by Faulkner] that Judge Gomolinski did not want Faulkner to miss the new date for that hearing. On that hearing date Judge Gomolinski ruled against Faulkner.

c). The second false complaint was a civil complaint, claiming breach of contract, by the Avgerinos on December 21, 2011 under case number 2011-L-013743 (*case 2011-L- 013743 is incorporated into this complaint, but not attached, herein*) filed by attorney Timothy L. Rowell presiding before presiding Judge Raymond W. Mitchell how was placed to fulfill the illicit plot to destroy or help destroy Marvin Faulkner.

100. By the year 2012, the intimidation and corruption plot against Marvin Faulkner and Samuel C. Umunna increase tremendously. Judge Darrly B. Simko and other Circuit Court judges generally cleared the court rooms, to hear Marvin Faulkner's and Samuel C. Umunna's cases, and always noted to Mr. Faulkner that, Faulkner would be held in contempt of court, if Faulkner would bread wrong, without just reasoning. Judges started clearing the court room of visitors and neutral litigants with the presence of Cook County Sheriffs always standing near Faulkner, Sheriffs' guns sometimes touching Faulkner's back. And, at the rear door of the court room there was always a Cook County Sheriff standing there that no one could enter or leave without the Judge's permission. Faulkner's and Umunna's only protection in the court's proceeding was to hire court reporters on 99% of the court calls, regardless if money permitted, Faulkner have over of 92 different "Report of Proceedings" at \$180.00 plus transcripts. This provided the only protection from the conspirators/Defendants, aforementioned. This only protection that Faulkner and Umunna had to protect themselves from the Defendants during the years that Faulkner and Umunna were in court with: Anna M. Loftus; Michael A. Eurich; Lizabeth Lyons; Darrly B. Simko; Alfred M. Swanson Jr.; Micheal Francis

Otto; Michael N. Varak; Meredith Freeman; Edward J. Lesniak; Pamela Mclean Meyerson; SoniaPasquesi; Samantha L. Babcock; Erik Hubbard and others. *(Faulkner has over 40,000 pages in documentations to uncover the conspirators and could and will produce the additional documentations and Transcripts of Report of Proceedings upon request and at importance of the matter at bar. However, more time is required.)*

101. Michael Eurich, attorney for UPB with full confident on many occasions bragged about his strong connections with the judges and the judges dedication to fight for the banks; that, there is no way that the banks will lose in their complaints. Then Michael Eurich said to Marvin Faulkner: "The judges are doing their job and doing quite well. The banks pay very well, to me and to the judges, including Otto. What a fool you are! Soon you will be poor; that will be a happy day." Recorded in "Affidavit of Marvin Faulkner" and in the "Complaint against a Judge" to the State of Illinois Judicial Inquiry Board on March 10, 2015.

102. On May 07, 2013, *Samantha L. Babcock*, acting as attorney for Urban Partnership Bank of the law firm of Chuhak and Tecason had a conversation about the drafted order by attorney Babcock. Faulkner did not agree with Attorney Babcock's drafted order; Faulkner, asked the clerk to recall the case for Judge Simko's review. Judge Simko had already left the bench, the clerk left inform Judge Simko of the recalls. This is when attorney Babcock told Mr. Faulkner that: *"You can continue to waste your time if you want; either at the bench or away from the bench, Judge Simko works for us, he will do what we want him to do."* Upon Judge Simko return, Judge Simko had already corrected the court's order, of Faulkner points and understanding, then judge Simko asked attorney Babcock is it as you understood. Miss Babcock's objections to the

corrected order, Judge Simko changed his corrected order to Babcock drafted order, and then returned to attorney Babcock an order accommodating attorney Babcock's objections. [Later, in May of 2016, Faulkner had learned the Samantha L. Babcock was not an attorney nor did the ARDC recognize Samantha L. Babcock as an attorney. That UPB and Chuhak and Tecason were illegally presenting Samantha L. Babcock a non-attorney to the court to progress their corruption on the court].

103. Samuel C. Umunna was ordered to Erik Hubbard office of Villa Capital Property (Receivers of UPB's Commercial Complaint to foreclose Shorebanks and Unumma's mortgaged properties) Judge Swanson ordered Umunna to personally deliver documents and any monies owed to the office of Erik Hubbard of Villa Capital Property on July 30, 2013 on or before 5 p.m. at 1414 East 62rd Place of Chicago, Illinois. Samuel Umunna and Marvin Faulkner, as a witness, arrived at Erik Hubbard of Villa Capital Property office to deliver the documents pursuant Court's order. Erik Hubbard received and opened the package and found no money therein. Erik Hubbard said in an angrily voiced spoke: *"You think that you are smart, you dumb asses, do you think that this is the only property that me and Samantha are involved in? We take more properties than you can ever imagine! You fuckers! You will see what Judge Swanson is going to do to you! You cannot escape from us; you dumb asses. You will not see any money from me. In fact, I am going to sue your asses. And, I am glad that I and the banks are going to take all of your properties, you fuckers, you boys get the hell out of my office."* Then, Mr. Faulkner and Mr. Umunna left Erik Hubbard's office. As a result of Erik Hubbard comments, it turns to be true, that Erik Hubbard was the receiver and end buyer of the properties that he as receiver and manager of the laundry scheme operation, therein.

And that UPB used a number of agents to fraudulently obtain properties and give kickbacks to his agents and other conspirators. [This is the hidden scheme of the operation that Faulkner and Umunna had found and believes to be the source funneling the corruption, herein].

104. In 2013, Timothy L. Rowell, of case number 2011-L-013743, routinely did not notice Faulkner of Rowell's motions and orders had in case number 2011-L-013743; including, ex parte orders drafted by either attorney Rowell or Judge Raymond W. Mitchell *i.e.*, On May 28, 2013; In part, stated, "Failure to appear will result in dismissal for want of prosecution or entry of a default order, Failure to comply with this order will be a basis for sanctions under Rule 219(c). Failure to enforce this order will constitute a waiver of such discovery by the party. This order was discovered by Faulkner in about December of 2013. In preventing Faulkner's revealing of the corruption e.g., "*Money Laundry Scheme*" by the defendants, Raymond W. Mitchell the judge on case number 2011-L-013743 involved himself in the conspiracy by orchestrating with Timothy L. Rowell; Irwin J. Solganick and Alexander P. White to ensure a judgment in favor of plaintiff, John Averginos and Attorney Timothy L. Rowell in an exorbitant amount J. Averginos requested a claim for \$100,000.00. Judge Mitchell ruling for J. Averginos for the amount of \$245,000.00 on John Avgerinos' fraudulent claim, this would aid in destroying Faulkner and lessen Faulkner's ability to litigate aggressively.

105. On December 04, 2013, Irwin J. Solganick and Alexander P. White became conspirators when and by a telephone call as witnessed by Faulkner and other in the court rooms when judge White's clerk stated that: "Judge Mitchell would be going to lunch soon and wants Faulkner's case back before judge Mitchell" being heard before Judge

White, immediately thereafter, fraudulently denied Faulkner's motion to Substitute Judge Raymond W. Mitchell for causes as incomplete, without Due Process to Faulkner returning Faulkner back to Judge Irvin J. Solganick who returned Faulkner to Mitchell from hearing the same clerk with the same message of Judge Mitchell lunch break.

a). On April 19, 2016; at or about 10:08 a.m. during a court's proceeding, in case #2011-L-13743 in the Circuit Court of Cook County, Illinois; a briefing schedule was being set between attorney Timothy L. Rowells and I. I asked Attorney Rowells: "Did you receive my waiver of summon for Federal court in case number: 1:16-cv-2432". Attorney Rowells looked at me and said: "I have a message for you from the judges. The judges want you to drop that federal case, to dismiss it; and, if you do not, they are going to put you in jail, one way or another." I said to attorney Rowell: "Others have threatened me as well." Attorney Rowells looked at me with a strange stare on his face and said nothing else, about, the threat that the judges, who are defendant(s) in case #16-cv-2432 In the United States District Court for the Northern District of Illinois Eastern Division to drop that Federal case. Thereafter, I and attorney Rowells set the briefing schedule in case #2011-L-13743.

106. On November 12, 2013; Samuel C. Umunna was falsely arrested by Judge Alfred M. Swanson Jr. from and by the direction of Eirk Hubbard (UPB court appointed receiver) pursuant to Eirk Hubbard's promise to direct Judge Alfred M. Swanson to punish Samuel C. Umunna for not having money with the documents delivered on July 07, 2013.

107. Court Reporter, Anna Lenard, appeared hired by Samuel C. Umunna and Marvin Faulkner, on November 19, 2013 about 9:45 a.m.; for a 10:00 a.m. court call, before

Judge Alfred M. Swanson Jr. in court room 2803 at the Daley Center in Chicago Court Reporter, Anna Lenard informed Faulkner: "I was in court and I was informed by the judge's clerk or his administrator that the matter was not set that a bond has been posted and was satisfied the judge and the matter has been taken from the call; and, there will be no proceeding and she was very sorry that I'm here, there must be some miscommunication that I, Anna Lenard, Court Reporter, need not set up so having been told that, the matter was not on call and was not set". Anna Lenard called to confirm, to no prevail/response. And, having the information from the judges' clerk, I packed up and I left." At 10:00 a.m. Mr. Umunna arrived to the court call set for November 19, 2013 before Judge Alfred M. Swanson Jr. and Marvin Faulkner arrived at 10:04 a.m. court call set for November 19, 2013, before Judge Alfred M. Swanson Jr. Samuel C. Umunna told Marvin Faulkner that the Court Reporter had not arrived yet. At about 10:15 a.m. Faulkner called Adrienne Lightfoot (Lightfoot) (Lightfoot is the court reporter who scheduled Anna Lenard for November 19, 2013) to find out if a court reporter was sent, no answer, a message was left by Faulkner to Lightfoot.

At about 10:37 a.m. Judge Swanson's clerk came to Faulkner and Umunna and asked them to come out in the hall to talk. Faulkner and Umunna went to the hall with the judge Swanson's clerk a Sheriff followed us and stood between the judge's clerk and Faulkner and Umunna. Faulkner asked the sheriff, is it necessary that you are standing in front of us; as if we are criminals. You are treating us like criminals. We are law abiding citizens and this is very disrespectful. The sheriff only looked at Faulkner and continued to stand aggressively at Faulkner and Umunna. The Judge's Clerk told Faulkner and Umunna that the bond was paid and there is no reason for you to be here."

Mr. Umunna then said; "I have an order slip from the sheriff, which orders me to be here. That this matter is up for today by Judge Swanson and of Judge Swanson's order, it is clear to appear today. I do not trust Judge Swanson, so I am making sure that Judge Swanson does not use me again for the purpose of pleasing the plaintiff". At about 10:41 a.m. Judge Swanson calls the case calls set for November 19, 2013 @ 10:00 a.m.

At about, 12:33 Anna Lenard the Court Reporter called Faulkner for payment of November 19, 2013 10:00 a.m. appearance before Judge Alfred M. Swanson Jr., Faulkner refused to pay court reporter Lenard for nonappearance. Anna Lenard informed Faulkner that Judge Swanson clerk told her to not set up and leave, so I did. Faulkner stated: "That no one told Faulkner or Mr. Umunna that a Court Report arrived to court and that no one has the right to tell the court reporter to leave directly or indirectly."

About one week after November 19, 2013, Judge Alfred M. Swanson Jr. recused himself from all of Samuel C. Umunna and Marvin Faulkner cases after formally complaints were made by Samuel C. Umunna revealing Alfred M. Swanson Jr. illicit acts to harm Samuel C. Umunna for his aggressive litigation.

108. On December 03, 2013, Marvin Faulkner, as noted within the affidavit of Marvin Faulkner, was told by Attorney Steven Anderson (Anderson), [whom have been dismissed with prejudice by Marvin Faulkner and Samuel C. Umunna pursuant a "GLOBAL SETTLEMENT AGREEMENT AND RELEASE" dated on October 05, 2016; therein, of paragraph 1(c) states: "THE PARTIES" acknowledge and agree that this Release is a final, full and general release as to any claims they have, had or may have against each other. "THE PARTIES" now know of or suspect the

existence of them and whether or not they are specifically described in this Release.”] as Attorneys boasts about the control they have over the Circuit Judges in Chancery Division. Attorney Anderson after a court call told Faulkner exits the court room; Attorney Anderson walked behind Mr. Faulkner and said to Faulkner. “I know that you have a judgment against you for \$246,000.00 dollars. It looks like everyone is beating you, do you think that it is because; you are trying to fight against us. You know what Attorney Babcock told you; UPB business is money, you do not have a chance, and we control the judges. Why do you think that Judge Swanson and Judge Kyriakopoulos make sure you look bad in court; they are with us! We have too many judges, UPB is powerful and there is nothing you can do about it. Faulkner I’m warning you; don’t destroy yourself; because, you are black, this is the only reason why I am telling you this and if you mention this to anyone. I will make sure you go to jail, like I made Judge Swanson put Umunna in jail. No more warnings.” Then I said: I know that UPB is much more powerful than I; but, I am not afraid.” Then Attorney Anderson walked away.

109. Filed complaint on November, 22, 2010 by Nationstar and their attorneys, case number 2010-CH-31405, participated in this illegal act to not allow Faulkner’s Due Process as Defendant; therein, when Notionstar; First Franklin Mortgage; Federal National Mortgage Association and Hauselman, Rappin & Olswang, LTD were well aware that Marvin Faulkner was the recorded owner of the subject property of case number 2010-CH-31405 that Warranty Deed recorded with the Cook County Recorder of Deeds Doc. # 0931301 000 filed on November 09, 2009.

110. On or before 11/09/10 Nationstar Mortgage, LLC, Citimortgage, Inc., and other

orchestrated a scheme to not name Marvin Faulkner in case number 2010-CH-31405, told to Marvin Faulkner by the laughing attorney, Sonia Pasquesi due to Marvin Faulkner's aggressive and keen legal participation during court's matters as in case number: 09M1 718493 had experienced Faulkner's keen legal participation.

111. On September 11, 2014 Judge Anna M. Loftus entered an order stating: "3rd party Intervener's motion are hereby stricken as moot, as this court no longer retains jurisdiction as the order approving sale was entered on March 18, 2014; however, on September 16, 2015; nearly 12 months without jurisdiction in case number 2010-CH-31405 and with Judge Loftus hate against Marvin Faulkner that Faulkner fight for justice. Judge Loftus on her own desire and without authority ignoring the law and gave herself jurisdiction when judge Loftus acknowledged that she did not have jurisdiction in the matter and order a briefing schedule to sanction on Marvin Faulkner in case number 2010-CH-31405, later to ignore her briefing on sanction for Loftus lacking jurisdiction.

112. On **September 16, 2015** Judge Anna M. Loftus ordered in case number 2010-CH-31405 the same case that on **January 22, 2015 ordered**, that Judge Anna M Loftus does not have jurisdiction to hear the any matter in case number 2010-CH-31405 and that Marvin Faulkner's petition is stricken, and CitiMortgage's oral motion for sanctions is denied as the Court does not entertain oral motions; and this matter is continued to 9/25/15 at 10:00 a.m. for status.

a). Later after the period of case number: 2009-M1-718493 had subsided. In the year of 2015 Judge George F. Scully Jr. asked Faulkner if Faulkner was still in possesses to the property of CHRISTINA PLACE II CONDOMINIUM ASSOCIATION

V. SHAYNA ST. CLAIR, MARVIN AND ALL UNKNOWN OCCUPANTS.

SUBJECT PROPERTY: 120 EAST 45TH ST., UNIT 2E, CHICAGO, IL. 60643.

Faulkner remembered the active role of Judge George F. Scully with Christina Place II Condominium Association., to illicitly take Faulkner's property.

113. The City of Chicago, under color of law, and in the scheme of intimidation and continues to conspire to target Marvin Faulkner and Samuel C. Umunna; herein, with little to no mercy to demolishing the properties of the Umunna's and Faulkner's without notice of court cases nor opportunity to correct any building violation that existed.

a). The City of Chicago, at intimidation and from the City places claims illicitly against the Plaintiff(s) and without causes. On or about February 24, 2015, Faulkner received a call from his tenant at 2015 West 69th Place, to learn that the fire had occur. Faulkner got a board up crew to board and secured the property. On February 26, 2015 Faulkner had the subject property board and secured. That, on March 26, 2015 Judge Mark J. Ballard (case number: 2014-M1-403324) order a demolition order on Faulkner's property at 2015 West 69th Place of Chicago Illinois without notice to Marvin Faulkner. April 23, 2015, through personal investigation, Marvin Faulkner a motion to vacate the March 26, 2015 order to demolition Faulkner's property at 2015 West 69th Place that was set for court call on May 14, 2015. On or about April 04, 2015 Faulkner learned that the City of Chicago had demolished Faulkner's property without allowing Faulkner the opportunity to repair. Faulkner filed several motions for adjudication without being allowed to adjudication.

114. Meredith Freeman at the direction of presiding Chancery Judge Marinos would move the case towards victory of foreclosure on the property in case number: 2008-CH-

13579. At times, of *Freeman's* frustration in case number 2008-CH-13579 attorney became upset with Judge Marinos because Judge Marinos knew that a ruling of Default was not possible and a ruling on a Summary Judgment because there were issues of material fact that were present according to Ihejirika's and Faulkner's Third Amended Answer in case number 2008-CH-13579 allowed by Judge Atkins. Later, Judge substitute Judge Meyerson was brought in for one day and one day only to rule on Summary Judgment thereafter Judge Anna M. Loftus presided over case number 2008-CH-13579. Judge Loftus ignored defendants' Faulkner's and Ihejirika's Third Amended Answer in case number 2008-CH-13579 and only ruled on defendants' Ihejirika First Answer to plaintiff's complaint and not the Third Amended Answer allowed by Judge Atkins in case number 2008-CH-13579 in 2014 that is still at issue on motion to vacate Judge Loftus' ruling/order.

115. Meredith Freeman was aware and was made aware that case number: 2008-CH-13579 should not be in Chancery at best Law Division; because, it was a breach of Contract issue and not a Foreclosure issue.

116. On **February 03, 2015**: Marvin Faulkner notarized his affidavit to report an encounter he had with Anna M. Loftus, that states in pertinent parts: "On January 28, 2015, I was at the Daley Center at or around 12:30 p.m. to file a *"Re-Notice" for case #2010-CH-31405 titled: "UNDER AND PURSUANT TO 735 ILCS 5/2-407 AND 735 ILCS 5/2-1401, PROPOSED INTERVENING THIRD PARTY DEFENDANT'S MARVIN FAULKNER'S, PETITION TO INTERVENE ACCORDING TO SECTION 735 ILCS 5/2(a)(1,2 &3); SECTION 735ILCS 5/15-1501 (b) 1,8 & 9 AND SECTION 735 ILCS 5/19-124"*. After, I filed my petition; I went to the 28th floor of the Daley Center to

deliver a courtesy copy of that petition to Judge Anna M. Loftus' clerk. I arrived on the 28th floor of the Daley Center, I walked towards the middle hall to deliver my petition, and then, I saw Judge Anna M. Loftus walking towards me and me towards her. As I approached Judge Anna M. Loftus I said: "Hello". Judge Anna M. Loftus said to me with a retaliation look on her face: **"Nigger, I'm going to enjoy destroying you"**. I became worried, unlike ever before, without stopping, I continued to walk, looking straight ahead. As, I passed Judge Loftus looking at me with a sinister laughter on her face, then she entered the doorway. I believe the Judge's elevator doorway. I delivered my petition to the clerk's/secretary's desk as a courtesy copy, I then left the Daley Center and went home; disregarding my other affairs needed at the Daley Center. I had prior threats from Judge Anna M. Loftus; including, when she denied passing a case call, when I requested to use the bathroom. But; the threat by Judge Loftus on January 28, 2015, was different; it hit me hard, when Judge Anna M. Loftus said to me: **"Nigger, I'm going to enjoy destroying you"'**.

117. On November 04, 2015 a telephone call at 2:25 p.m. from the telephone number 1-773-869-7100 from a Cook County Sheriff's Police Detective name Pierce of badge number *723 from the Investigations Section, with a disturbing conversation but a soothing deliver; asked Faulkner to visit his office to clear his[Faulkner's] name that came before him [Detective Roderick Pierce] given by Circuit Court Judges. Faulkner's immediate response was, in the manner of, please officer tell me what are you talking about? Detective Pierce stated: "Don't worry it's not criminal, at best it's a civil issue that came before Detective Pierce, what time are you [Faulkner] able to meet me at 1401 Maybrook Drive, Maywood Illinois". Faulkner told detective Pierce that: "That I cannot

at this time” and “What matter is there that I must clear my name.” Detective Pierce would not tell Faulkner why only urging Faulkner that, only a few minutes of Faulkner’s time is required. Faulkner then said that Faulkner would have to check out Pierce to be sure Pierce is who Pierce says he is. After, Faulkner hung the phone with the individual [Now known to be Detective Pierce], Faulkner called 911 and reported the phone call and Faulkner alerted 911, that Faulkner was afraid and worried of the call. Because, since around August Faulkner filed an Amended Federal Complaint against: Judges, Banks, Law Firms, lawyers and others in case number 15-cv-3344 with the intention to uncover corruption and illicit behavior, therein. The 911 dispatcher sent an officer [female] to Faulkner’s home and for about an hour Faulkner and the dispatched officer talked and a report was noted as the officer told Faulkner she would do.

118. **On November 05, 2015** at about 5:44 p.m. Faulkner received a telephone message from his son, with a concerned temperament in his [son] voice which was left with Faulkner. Faulkner returned the call; then, Faulkner received harsh information, that people, men, are banging on the door and shining bright lights into the house. Faulkner immediately left what he was doing and headed home.

Upon Faulkner arriving home, in front of Faulkner’s house there was a parked car with a spot light on the drivers’ door, it could have been an unmarked car, but Faulkner was not sure. Faulkner called 911 to assist, in case of any danger. A 911 officer came within several minutes. The officer dispatched by the 911 operator came and called Faulkner by telephone to open Faulkner’s house door to speak with the 911 officer, Faulkner did. Thereafter, in part, the following conversation occurred. Meeting the 911 officer, Faulkner said to the 911 officer that, a situation has occurred; after, Faulkner had

filed an amended federal civil complaint against: judges; banks; and law firms and co-conspirators under a Rico complaint to be adjudicated in federal court justices on August 03, 2015. Since then many strange things have been happening and Faulkner felt threatened. Faulkner believes that the judges whom Faulkner has filed a complaint against are orchestration harm to Faulkner for Faulkner's attempt to uncover corruption in the judicial system. But, not the judicial system only a hand full of others that were using the judicial system for illicit purposes.

Thereafter, Officer Pierce *723 noted that the purpose that the purpose that he's is to give opportunity to Faulkner, that Faulkner may clear his name from a list of potential suspects of a letter that was giving/address to judges in the Cook County area. Faulkner assured Officer Pierce, *723, that nothing Faulkner have done is illicit; that Faulkner's has the right to sue for illicit behavior, even a judge. Officer Pierce, *723 accompanied by Officer Carter; I believe, continued in their efforts to convince Faulkner to accompany them to their office for conversation, only a few minutes of Faulkner's time. Faulkner refused/digressed their offer; but, agreed to meet in the morning of the next day. As the conversation continued Officer Pierce and Officer Carter continued in their positioning that Faulkner was not under arrest but insisted that Faulkner come with them. Faulkner refused. At that point the 911 officer announced his departure and greeted all well. The moment the 911 officer left the following occurred, as permitted to the remaining officers concurred of the following as recorded: **Faulkner:** "Do you mind if I turn this on". **Officer Pierce:** "No, I do not mind." **Faulkner:** "If we can possibly, what's a good time, do you start tomorrow?" **Officer Pierce:** "We start at 7 in the morning." **Faulkner:** "7 in the morning and you're in Maywood, so you're not too far from here".

Officer Pierce: “Not too far from here.” **Faulkner:** “And, I have to come to your office verses you tell me what’s going on here.” **Officer Pierce:** “We prefer you come to our office.....(see affidavit).....” **Officer Carter:** “Sorry to cut you off Marvin, you said that there were no other adult in the house?” **Faulkner:** “My son”. **Officer Carter:** “Just your son and your daughter?” **Faulkner:** “Right.” Officer Carter: O.K. bottom line is this; you’re going to have to come with us tonight for questioning that is not an option.” **Faulkner:** “Why is that?” **Officer Carter:** “Hmmm”. **Faulkner:** “Why?” **Officer Carter:** “Because you do.” **Officer Carter:** “Like my partner said your name came up in an investigation and this have to be taken care of tonight there is no other options, o.k., you’re not being formally charged with anything right now; but, we do have to ask you some questions and it has to at the police station.” **Faulkner:** “Can I get my jacket and my tie and I will be right back is that o.k. I am coming right back. I just want to get my jacket and my tie I like to look like you guys.” **Officer Carter:** “that’s not necessary sir, you will be in a car; there is heat in the car, less than 10 minutes away from the police station; you will be in and out, o.k.” ... Eventually, Faulkner was taken, under Faulkner’s duress, to 1401 Maybrook Drive, Maywood, Illinois by detective Pierce and Detective Carter and held there for over 24 hours under detainment and questioning without being charged with any charges.

119. Faulkner was detained against his will Faulkner cooperated with the Sheriff’s Police, Cook County Department from the dates of November 05, 2015 at about 7:45 p.m. until the date of November 06, 2015 at about 8:14 p.m., under Faulkner’s duress. With only one message Faulkner had for the Officers of the investigation (See recording therein the recording by the Sheriff’s Police Cook County Department) that Faulkner

filed a federal Civil Claim under case number 15-cv-3344 charging judges; law firms and their co-conspirators with RICO claim and that Faulkner believe that the judges; law firms and the co-conspirators are trying to frame Faulkner so that Faulkner do not uncover their corruption. Faulkner has not done anything wrong or illicit to be questioned by the officers, any officers. Faulkner's attorney visit and informed Cook County Sheriff that Faulkner will no longer answer any more question without his attorney. Within hours the Cook County Police released Faulkner. Faulkner's rights were stripped by the Cook County Sheriff's Police Department and embarrassed at his home in front of his neighbors. But the more disturbing thing occurred and concerned Faulkner greatly. Faulkner's finger prints and palm prints was taken an enormous amount of times. Two complete ink prints of both Faulkner's complete hand and twice by computer. **[Faulkner hopes that his hands prints' will not be used for illicit purposes, as it appears to Faulkner as it appears to be an extreme amount of times, to take both Faulkner's hands prints without being charged with any charges]**. Again, later, Faulkner was released with no charged but, the officers doing Faulkner's release could not find Faulkner personal bags that was taken from Faulkner during his lock-up by the Cook County Police. That the officers at Faulkner's detainment for investigation decided to separate Faulkner's personals items into two separate plastic bags, for about 5 minutes during Faulkner's release and the search for Faulkner's missing items that should have been in lock-up and undisturbed. Officer Pierce came from, Faulkner believe, Officer Pierce office with Faulkner missing personal items that by law should had been in lock-up. Faulkner believes that herein is corruption; and, that the illicit judges are not happy of my release with no charges by the Cook County Sheriff's Police Department. The illicit judges and co-conspirators will continue to try and frame Faulkner, continuing

their intimidation.

120. On **November 19, 2015** by judge Abbey Fishman Romanek ordered and declared:

"Mr. Faulkner, I have reviewed your motions; one for disqualification and the other to vacate September 25, 2015 court's order. After, vigilant review your matter should not be before me. As you've stated and provided exhibits to me and showed that you are an owner of the property in which this matter stemmed from a Chancery case 2010-CH-31405. The exhibits shows that you were not noticed in case number 2010-CH-31405; however, your fight is not in this court room. Your fight is in Chancery; you will have to go back to Chancery and file a motion. I do not know why you were not served summons and complaint. I do see, that in 2009 you've recorded the warranty deed and in 2010 plaintiff filed their foreclosure. I do not know if your direction is by motion to quash, voidness or whatever the case, your fight is in Chancery. Therefore, I will order the following: **1.** On the Court's own motion the May 15, 2015 order allowing Faulkner to intervene is vacated, based on Faulkner making this court aware that he is an owner of 120 East 45th Street, Unit number 202 in case number: 2010-CH-31405. **2.** The motion to vacate September 25, 2015 order is denied. **3.** The motion to disqualify judge Romanek is denied. **4.** Trial on December 4, 2015 at 9:30 a.m. as to unknown occupants.

121. That, Samuel C. Umunna on several occasions was visited and harassed at his home by the Cook County Sheriffs requesting for conversations; due to, Faulkner's and Umunna's aggressive litigation against the defendant, herein.

122. The City of Chicago, at intimidation and from the City places claims illicitly against Faulkner's properties without causes. On or about February 24, 2015, Faulkner

received a call from his tenant at 2015 West 69th Place, to learn that the fire had occur. Faulkner got a board up crew to board and secured the property. On February 26, 2015 Faulkner had the subject property board and secured. That, on March 26, 2015 Judge Mark J. Ballard (case number: 2014-M1-403324) order a demolition order on Faulkner's property at 2015 West 69th Place of Chicago Illinois without notice to Marvin Faulkner. April 23, 2015, through personal investigation, Marvin Faulkner a motion to vacate the March 26, 2015 order to demolition Faulkner's property at 2015 West 69th Place that was set for court call on May 14, 2015. On or about April 04, 2015 Faulkner learned that the City of Chicago had demolished Faulkner's property without allowing Faulkner the opportunity to repair. Faulkner filed several motions for adjudication without being allowed to adjudication.

123. On April 19, 2016; at or about 10:08 a.m. during a court's proceeding, in case #2011-L-13743 in the Circuit Court of Cook County, Illinois; a briefing schedule was being set between attorney Timothy L. Rowells and I. I asked Attorney Rowells: "Did you receive my waiver of summon for Federal court in case #16-cv-2432". Attorney Rowells looked at me and said: "I have a message for you from the judges. The judges want you to drop that federal case, to dismiss it; and, if you do not, they are going to put you in jail, one way or another." I said to attorney Rowell: "Others have threatened me as well." Attorney Rowells looked at me with a strange stare on his face and said nothing else, about, the threat that the judges, who are defendant(s) in case #16-cv-2432 In the United States District Court for the Northern District of Illinois Eastern Division to drop that Federal case. Thereafter, I and attorney Rowells set the briefing schedule in case #2011-L-13743.

a). On April 29, 2016, by and through Detective Roderick Pierce, Star #965, Cook County Sheriff's Police officer, intruded on Faulkner's home (as Detective Pierce have done several time and as well Faulkner call 911 to report the intimidation by Detective Pierce) with a message from the judges and defendants, in the case at bar, Faulkner believes, [for the purpose to threaten and harass Faulkner to drop the federal case against judges, banks, law firms, attorneys and individuals for their alleged illicit activities to defraud Faulkner and Umunna, as well as, the other good people of the State of Illinois].

b). That, Detective Roderick Pierce, Star #965, on April 29, 2016 at or around 12:15 p.m. intruded at the home of plaintiff Faulkner's with what Faulkner believes to be a fraudulent GRAND JURY SUBPOENA DUCES TECUM, Faulkner was warned by whistleblower(s) of the illicit scheme of the defendant(s) to put Faulkner, at the very least in jail; because of Faulkner's and Umunna's RICO claim in federal court. The GRAND JURY SUBPOENA DUCES TECUM was dated for May 13, 2016 at 9:00 O'clock in the a.m. at the Circuit Court house in Chicago, 26th and California Avenue in courtroom 406. Faulkner did not attend that fraudulent GRAND JURY SUBPOENA DUCES TECUM that he received by Detective Pierce for reasons Faulkner gave in his motions to the Federal Court titled: "PLAINTIFF'S, MARVIN FAULKNER'S, MOTION FOR INJUNCTIONS AND RESTRAINING ORDER AGAINST ALL DEFENDANT(S) ANT THEIR AGENTS [AT ISSUE]" and well as the motion titled: "PLAINTIFF'S MARVIN FAULKNER'S, MOTION FOR EQUITABLE ESTOPPEL FROM DEFENDANTS NAMED IN CASE NUMBER 16-CV-2432, IN CASE AT BAR".

c). Faulkner did not appear on May 13, 2016 at 9:00 O'clock in the a.m. at the Circuit Court house in Chicago, 26th and California Avenue in courtroom 406 of the

fraudulent GRAND JURY SUBPOENA DUCES TECUM, believed by Faulkner. Detective Roderick Pierce, Star #965, [Coincidentally, Faulkner knows that Detective Roderick Pierce has at least two badge numbers: Star #965 and Star #723, which is very unsettling with Faulkner]. That on May 16, 2016, the same Detective Roderick Pierce circled Faulkner house from front to back. Faulkner during one of Detective Roderick Pierce circle of Faulkner was in this garage with the overhead door raised. Faulkner saw Detective Roderick Pierce and Detective Roderick Pierce saw Faulkner. Detective Roderick Pierce quickly looked forward and parked at the end of the alley of Faulkner's block waiting, Faulkner called 911. 911 came and brought Detective Roderick Pierce to Faulkner's garage. This is when Detective Roderick Pierce gave Faulkner another on page paper titled: "RULE TO SHOW CAUSE WHY RESPONDENT SHOULD NOT BE HELD IN CONTEMPT" schedule for May 23, 2016, at 10:00 a.m. at the Cook County Circuit Court house in courtroom 101, 2600 South California Avenue, Chicago, Illinois. It stated: "IT IS ORDERED: that a Rule is hereby entered against MARVIN FAULKNER to appear on Monday May 23, 2016, at 10:00 a.m. at the Cook County Circuit Court house in courtroom 101, 2600 South California Avenue, Chicago, Illinois and show cause why he should not be held in contempt of this Court for failure to appear and answer a subpoena signed by Judge Leroy K. Martin-1844. Faulkner appeared on May 23, 2016; however Judge Leroy K. Martin did not know that Faulkner had appeared due to his order. Judge Leroy K. Martin stated that the proceeding was had on a motion by the plaintiff in case caption:

PEOPLE OF THE STATE OF ILLINOIS vs.) CONTEMPT OF COURT) VIS-À-VIS)
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MARVIN FAULKNER

) APRIL 2016 Grand Jury
) #705

d). At this point, as of May 23, 2016, Faulkner is intimidated and has great fear of the Defendant(s) in their great power to destroy not only properties but lives.

e). Marvin Faulkner now was assured, with no doubt, that Faulkner and Umunna are on a "**Hit List**" for revealing the "*Money Laundering Scheme*" by the Defendants.

124. On February 11, 2016 service of summons and eviction complaint (case number: 2016-M1-702505) was made on Baseemah M. Dear Townsend (Townsend) (personally served) and All Unknown Occupants (substitute service) by Cook County Sheriff's Department.

125. Townsend had informed Faulkner that Attorney Roderick F. Wimberley is helping and is directing Townsend to file a 298 petition and a jury demand with the Circuit Court of Cook County, Illinois. Townsend acknowledged to Faulkner, that Judge Anna M. Loftus connected Attorney Roderick F. Wimberly with Townsend's as needed, without cost.

126. On April 01, 2016, Townsend boasted to Faulkner, that Judge Loftus, ensured Townsend, which she will be allowed to stay in the "property" without paying rents and if Townsend follows the directions of Judge Loftus'; Judge Loftus would be awarded the property known as 2353 South Kenneth Ave., (house), Chicago, Illinois 60623 to Townsend.

127. On April 01, 2016 Judge Abaya I. Desierto ordered in favor of Townsend and fraudulently Dismissed Faulkner's eviction case against Townsend and orders the followings (a, b, and c):

a. A Ruling dismissing Plaintiffs' entire cause;

- b. A Ruling sealing the record; *and*
- c. And, Pursuant to Illinois statute Judge Desierto allowed Plaintiffs one year to Re-File, at Plaintiff(s)' cost.
- e. **Further:** Judge Desierto noted that he wants to be a judge for a long

time and that he will not get in the way of Judge Loftus' dealing in this case.

128. Also, on April 01, 2016, Townsend boasted to Faulkner, that Judge Loftus, ensured Townsend, that she will be allowed to stay in the "property" without paying rents and if Townsend follows the directions of Judge Loftus'; Judge Loftus would be awarded the property known as 2353 South Kenneth Ave., (house), Chicago, Illinois 60623 to Townsend.

129. At the April 26, 2016, during the court proceeding of the "Claim", a Deputy Sheriff, name unknown, approached Faulkner requiring his I.D., after Faulkner's questioning the sheriff, Faulkner eventually gave his I.D. to said Sheriff. Then the Sheriff gave Faulkner an "*Allegations Petitioner Information*" by petitioner, Baseemah M. Dear Townsend in the CIRCUIT COURT OF COOK COUNTY, ILLINOIS DEPARTMENT-DOMESTIC RELATIONS DIVISION case number: 2016-PO-72053 (the "*Domestic Complaint*").

130. *Domestic Relations Division* is: "A court order entered to protect a petitioner (the person who is seeking the relief) from the respondent (the person who allegedly hurt the petitioner). A civil order of protection can only be filed against certain persons with whom the petitioner has a special relationship with: people who are married or formerly married; people who are related by blood; people who live together or formerly lived together; people who are dating or formerly dated; people who are engaged or formerly

engaged; and people with disabilities, against their caregivers.” (Emphasis added).

131. Under the direction of Judge Loftus, according to Townsend, Judges Rice’s and Ball-Reed’s fraudulent Ordered of Protection in favor of Townsend and against Faulkner that tenant Townsend would be able to seized possessed and take Faulkner’s or Faulkner would lost his property. From the fraudulent Domestic Relation Division case; stemming from Judge Loftus; in which, Faulkner do not have a Domestic Relations with Townsend, nor did Townsend ever allege a domestic relationship with Faulkner as a backlash against Faulkner, for Faulkner revealing the defendants’ “Money Laundry Scheme” and also Rights Judges Rice’s and Ball- Reed’s violated Faulkner’s 2nd amendment Constitutional rights.

132. As on or about April 01, 2016 Marvin Faulkner was told by Baseemah M. Dear Townsend that: “The judges are going to get you and I’m going to help”.

133. In case number: 2012-M1-702484; on June 16, 2016, Faulkner filed a motion, therein, to continue the eviction of Sumatro Simpson, April Arquette and All Unknown Occupants in the CIRCUIT COURT OF COOK COUNTY, ILLINOIS MUNICIPAL DEPARTMENT, FIRST DISTRICT, case number: 2012-M1-702484. Sumatro Simpson, April Arquette and All Unknown Occupants the tenants to evict at 13301 South Burley, Chicago, Illinois; which was filed on January 30, 2012. On or about July 29, 2016 Sumatro Simpson, April Arquette and All Unknown Occupants surrender the property, 13301 South Burley, Chicago, Illinois, to Marvin Faulkner. At Court, on or about July 29, 2016, Sumarto Simpson told Faulkner that: (Someone from the Circuit Court was helping Simpson to stay in Faulkner’s property, Simpson deciding to give the property back to Faulkner. Simpson Stating to Faulkner: “Sorry you can have your

property back”).

134. Prior and January 04, 2017, Faulkner motioned for extension of time pursuant the November 22, 2016 court’s order awaiting for the case to be call, Faulkner went to the bathroom as Faulkner exited the bathroom on the 28 floor, near the door of courtroom 2803 of the Daley Center, Faulkner saw a Sheriff (Daniel Gronowski (Gronowski)), and attorney Michael N. Varak, Gronowski, assigned to Judge Anna M. Loftus’ in courtroom 2801. Faulkner quickly turned to drink water and thereafter Faulkner pretends to be on his cell phone. Faulkner overheard Gronowski and attorney Michael N. Varak, the attorney assigned to Faulkner’s case as plaintiff in case number: 2008-CH-13579 talking Gronowski who said: “Judge Loftus want you to follow Judge Sullivan’s lead”. Then, attorney Michael N. Varak said: “Okay”. Then Michael N. Varak entered courtroom 2803. Faulkner waited a short time, about 30 seconds, and then Faulkner re-entered courtroom 2803 to wait for case number: 2008-CH-13579 to be called. The case was called last in the parties went to the bench. Michael N. Varak approached the bench only once, case number: 2008-CH-13579.

135. Further the method of LaSalle Bank; Encore Credit; EMC Mortgage Corporation; Mortgage Electronic Registration Systems; Codilis & Associates; U.S. Bank and Alexander D. Marks to place/name the City of Chicago named as a named defendant in case number: 2008-CH-13579 was malice and improper and was told either in written form and at hearings that plaintiff’s misrepresent to the court (*i.e.* misjoinder: City of Chicago) is designed to cripple Faulkner and Ihejirika. Each of the above justices as noted had opportunity to correct the plaintiff’s fraudulent foreclosure complaint. Faulkner believes as noted in the **Rico** complaint case no: 16-cv-02432. Faulkner will continue to

motion the Court that because and due to the issue of the defendants' rights of Removal LaSalle Bank and U.S. Bank have violated Faulkner's and Ihejirika's rights of Removal of case number: 2008-CH-13579 to Federal Court. Further, are committing fraud through misrepresentation within this matter and the other if not all of their judicial fiduciary duties.

136. July 14, 2010 posted in the *TRUST ASSIGNMENT FRAUD LETTER TO SEC* that: "This is a report of suspected fraud involving mortgage-back securities. Certain mortgage-backed trusts have been using forged and fraudulent mortgage assignments in foreclosure actions... and throughout the United States" and that Bear Stearns Asset Backed 1 Trust 2007-HE6/LaSalle Bank National, as Trustee for Certificate holders of Bear Stearns, Asset Backed Securities I, LLC, Asset-Backed/Certificates, **Series 2007-HE6** is listed, therein. It further stated that "Replacement Assignments" including Assignments that were prepared with false information regarding dates and signers and (among other illegal acts) it stated that "In many cases, where the Trust has successfully foreclosed, it had no legal right to do so.....(See complete claims against **Series 2007-HE6**) layers and layers of pages. And, Winifred Ihejirika, wife of Marvin Faulkner's, reported to the court within her affirmative defenses that not only were the signature on the purposed mortgage and note presented by LaSalle Bank in case number 2008-CH-13579-not her. But, that the mortgage she has in case number 2008-CH-13579 is unsecured and therefore the law suit should be a contract issue not a foreclosure issue. The judge presiding [and several other judges] refused to perform an evidential hearing on the matter. Several *Whistleblowers* informed Marvin Faulkner that the illegal taking of people's properties and court's corruption to take the peoples properties; and, to favor

the banks and law firms at any and all cost. Thereafter Marvin Faulkner became aggressive in litigation and filed many complaints against judges and bank and law firms. Many judges thereafter placed Marvin Faulkner on a "Hit List"; aimed to take and destroy Marvin Faulkner and anyone connected with him.

VII. UNDER INFORMATION AND BELIEF:

A. The Master Plan of the Defendant(s).

137. The "*Money Laundering Scheme*": the Banks forced and/or instructed as many loans and mortgages to go bad; become unpaid; become breached and/or misrepresented without consideration of the laws of the land; using, mortgage servicers; mortgages broker, loan officers, loan processors, underwriters and appraisers to fraudulently claim or report that mortgages went bad or unpaid to accelerate fraudulent mortgages and foreclosures - as a Default mortgages - so that the banks may proceed in their illicit mortgages foreclosures loans/mortgages could be claimed in Default" that the process of stealing properties; may begin. Thereafter, In turn, banks are ensured that the illicit/fraudulent loans/mortgages could be launder/legitimized by the legal system that judges, banks, law firms, attorneys and individuals would illicitly act **under color of the law**: by fraudulent hide information, misrepresent information, ignore documents presented before the court to prolong processing that disfavors the ill-gotten gains of the racketeering enterprise of *Conspiracy* and *Extrinsic Fraud against its clients* this ensure that the Banks can remarket their illicit/fraudulent loans and mortgages for unlawful profit/benefit from the revolving, flipping and controlling properties through recovering the illicit/fraudulent loans and mortgages; receiving ill-gotten gains. This has increased the indebtedness to the banks of the loans/mortgages in the Bank's favor. Through

Faulkner's formally complaining against: judges, banks, law firms, attorneys and individuals of their illicit acts *under color of the law* and revealing the Defendants "Money Laundering Scheme". Faulkner was placed on a "**Hit List**" by the Defendants, now, because of the Defendants' machinations, Faulkner's life is in danger by the Defendant(s). That the banks are funneling unlawful pays through receivers; law firms; donations and lawyers to the judges on the bench to rule and support the banks' ill-gotten gains.

B. Detailed Description of the Operation of this RICO Enterprise:

138. The aforementioned "*Money Laundering Scheme*" enterprise is a simple but intricate system, here forth, described:

- a. **Banks**: are making unlawful payout to law firms and others for the accomplishments of increasing their financial bottom line, either by legal means or by twisting legal means to a semblance, as it is legal ["By hook or by crook"].
- b. **Law firms**: are using lawyers; judges; politician; receivers and others by designing legal methods by whatever means necessary; be they fair or foul, with a resilient of legal appearance. **The Law firm prepares and initiates** the process as directed by the banks [to edit, falsify, create documents, if needed, to obtain its objectives].
- c. **Judges**: are directed to by either forced; and/or by assurance of a position to become an appointed judge or remain as an appointed judge; and/or by percentage of their ability to foreclose or transfer profit, illegitimately or legitimately, from the public or individuals to select private groups of individuals; including; banks; law firms; governmental entities or/and strongly backed individuals. **Judges** also, provides a strong

litigation for the law firms of the Plaintiffs' that banks minimize mistakes from the assigned law firm(s) or lawyer(s). **Judges** are also used for intimidation to outsiders of their enterprise. They provide court orders to legitimize illicit activities then, the issue, is laundered by the legal system. **Judges** also interact among other judges for the purpose of unanimity for their racketeering and corruption of and by the actors. **Judges** are also used to keep other judges in line keeping silent of the racketeering, aforementioned to be sustained. **Judges** edit and instruct *lawyers and law firms'* legal theories and writing to legitimize suppositions; personally or by directions.

d. **Receivers and Others**: are used as needed to perform any and all necessary tasks, at a benefit, legally or illegally for profit of their contribution and of their act or acts.

e. Judge Sullivan in his illicit plot against Marvin Faulkner with Judge Loftus and other has unjustly threatened Marvin Faulkner with Contempt of Court, without a cause.

C. Fiduciary Trust between Plaintiff and Defendant(s).

139. The Defendant(s) used Federal and State laws: i.e. FDIC; UNITED STATES CONSTITUTION; FICA; UNIFORM COMMERCIAL CODE; and STATE LAWS that Marvin Faulkner and others entrust that their 14th Amendment of the Constitution of the United States of equal protection of the law, would be preserved, focused, and/or the principal instrument used for justice and adjudication in the court of laws would be fair and just.

D. Execution of Fiduciary Trust between Plaintiff and Defendant(s).

140. Marvin Faulkner was summoned to court and/or instructed by Federal and State laws to use the Court system for adjudication of any and all meritorious legal issues to the laws of the land would be fair and just. Faulkner is a United States American citizen,

with great appreciation for this Republic and respect of the laws. Faulkner is a law abiding human being, with a strong Love of God, who is, the creator of all things. Faulkner is directed by the Christian bible {i.e. to do right and to stay away from doing wrong}. Faulkner, found that some judiciaries and others, under color of law, are secretly using the legal system for personal ill-gotten gains. Faulkner either made his appearance or filed his complaint(s); pleadings and/or filings in the judicial system, entrusting that U.S. Laws and State Laws would be preserved.

141. Faulkner found that, secretly and deceitfully some entities are using the established trust of the judicial system in disregard of its purpose as set forth in this "Plaintiff's Verified Complaint-Civil Rico."

VIII. COUNTS:

COUNT I – RICO (Violations of RICO, under 18 U.S.C. §1961 et. seq. and 18 U.S.C. Section 1962(c) (RICO), 18 U. S. C. § 1962 (C)) **VIOLATION OF 18 U. S. C. § 1962(d))**

142. Plaintiffs, Marvin Faulkner and Samuel C. Umunna, incorporates and restates each of the above paragraphs [in reference each allegation in all of the above sections, paragraphs, and sub-paragraphs] as if fully set forth herein this count.

143. ANNA M. LOFTUS; WILLIAM FARROW; PIERCE & ASSOCIATES; FEDERAL DEPOSIT INSURANCE CORPORATION; URBAN PARTNERSHIP BANK; SHOREBANK; JENNER & BLOCK LLP; CHUHAK & TECSON, P.C.; MICHAEL A. EURICH; VILLA CAPITAL PROPERTIES; GEORGE F. SCULLY JR.; ELIZABETH LYONS; DARRLY B. SIMKO; CITY OF CHICAGO; ALFRED M. SWANSON JR.; LASALLE BANK NATIONAL, as trustee for Certificate holders of Bear Stearns Asset Back Securities I, LLC, Asset-Backed; Certificates, Series 2007-HE6;

MORTGAGE ELECTRONIC REGISTRATION SYSTEMS; ENCORE CREDIT; EMC
MORTGAGE CORPORATION; BEAR STEARNS ASSET BACKED SECURITIES I
LLC; NATIONSTAR MORTGAGE, LLC; CITIMORTGAGE, INC.; BEAR STEARNS
ASSET BACKED SECURITIES I TRUST 2007-HE6; FEDERAL NATIONAL
MORTGAGE ASSOCIATION; FIRST FRANKLEN MORTGAGE; US BANK
NATIONAL ASSOCIATES; MICHAEL N. VARAK; BRYAN GOMEZ; KOVITZ,
SHIFRIN & NESBIT LAW OFFICE; MEREDITH FREEMAN; EDWARD J.
LESNIAK; ALEXANDER D. MARKS; PAMELA MCLEAN MEYERSON; BURKE,
WARREN, MACKAY & SERRITELLA, P.C.; CHRISTINA PLACE II
CONDOMINIUM ASSOCIATION; RAYMOND W. MITCHELL; IRWIN J.
SOLGANICK; ALEXANDER P. WHITE; TIMOTHY L. ROWELL; STARR,
BEJGIERT, ZINK & ROWELL; CODILIS & ASSOCIATES; COOK COUNTY
SHERIFF'S POLICE DEPARTMENT; SONIA PASQUESI; JOHN AVGERINOS;
PAUL AVGERINOS; SAMANTHA L. BABCOCK; ERIK HUBBARD;
HAUSELMAN, RAPPIN & OLSWANG, LTD *and* RODERICK PIERCE **have** acted
under the color of law when LOFTUS; FARROW; PIERCE; FDIC; UPB;
SHOREBANK; C & T; EURICH; VCP; SCULLY; LYONS; SIMKO; CHICAGO;
SWANSON JR.; LASALLE BANK; MERS; ENCORE; EMC; BEAR STEARNS;
NATIONSTAR; CITIMORTGAGE; BEAR STEARNS 2007-HE6; FNM; FIRST
FRANKLEN; US BANK; VARAK; GOMEZ; KS&N; FREEMAN; LESNIAK;
MARKS; MEYERSON; BWMACKAY & S; CHRISTINA PLACE II; MITCHELL;
SOLGANICK; WHITE; ROWELL; SBZ&R; CODILIS; COOK COUNTY SHERIFF'S;
PASQUESI; J. AVGERINOS; P. AVGERINOS; BABCOCK; HUBBARD; HR&O *and*

PIERCE deprived Plaintiff of **their** Constitutional Rights, as well as, violating the 2nd, 4th, 5th and 14th Amendments Rights federal rights, property interests and otherwise discriminated against Marvin Faulkner and Samuel C. Umunna, based upon the illicit acts by the LOFTUS; FARROW; PIERCE; FDIC; UPB; SHOREBANK; C & T; EURICH; VCP; SCULLY; LYONS; SIMKO; CHICAGO; SWANSON JR.; LASALLE BANK; MERS; ENCORE; EMC; BEAR STEARNS; NATIONSTAR; CITIMORTGAGE; BEAR STEARNS 2007-HE6; FNM; FIRST FRANKLEN; US BANK; VARAK; GOMEZ; KS&N; FREEMAN; LESNIAK; MARKS; MEYERSON; BWMACKAY& S; CHRISTINA PLACE II; MITCHELL; SOLGANICK; WHITE; ROWELL; SBZ&R; CODILIS; COOK COUNTY SHERIFF'S; PASQUESI; J. AVGERINOS; P. AVGERINOS; BABCOCK; HUBBARD; HR&O *and* PIERCE.

144. As a direct and proximate result of LOFTUS; FARROW; PIERCE; FDIC; UPB; SHOREBANK; C & T; EURICH; VCP; SCULLY; LYONS; SIMKO; CHICAGO; SWANSON JR.; LASALLE BANK; MERS; ENCORE; EMC; BEAR STEARNS; NATIONSTAR; CITIMORTGAGE; BEAR STEARNS 2007-HE6; FNM; FIRST FRANKLEN; US BANK; VARAK; GOMEZ; KS&N; FREEMAN; LESNIAK; MARKS; MEYERSON; BWMACKAY& S; CHRISTINA PLACE II; MITCHELL; SOLGANICK; WHITE; ROWELL; SBZ&R; CODILIS; COOK COUNTY SHERIFF'S; PASQUESI; J. AVGERINOS; P. AVGERINOS; BABCOCK; HUBBARD; HR&O *and* PIERCE *Violation of Rico [violations of Rico, 18 U.S.C. §1962[C] & violation of §18 U.S.C. §1962[D]]*, Marvin Faulkner and Samuel C. Umunna, **have** sustained injuries and/or damages.

- a. The Plaintiff(s) is targeted and harmed physically, by illness and

emotionally distress of the illicit plot by the Defendant(s).

b. The Plaintiff(s) have suffered extreme financial damages as
aforementioned in this Second Amended Verified Complaint.

c. The Plaintiffs believe that their telephones and computers are being tap
by the Defendant(s).

FRAUD
CONSPIRACY TO VIOLATE RICO,

A. Defendant(s) conduct as described above constitutes common law fraud.
Plaintiffs incorporate all allegations of fraud in their RICO claim into this claim and
hereby assert a claim for fraud and recovery of actual and punitive damages.

2. Defendant(s), either directly or through their agents or as part of the overall
conspiracy as described herein misrepresented the benefits against Plaintiffs.

3. These misrepresentations were made either willfully, or alternatively, negligently
without regard for their truth. The misrepresentations were intended by Defendants to
be relied on by Plaintiffs. Defendant(s) willfully, or alternatively, negligently, prevented
plaintiffs from fully understanding the truth in order to prevent Plaintiffs from
discovering the various misrepresentations and fraud, or alternatively, negligence as
alleged herein.

4. Defendant(s) also fraudulently and intentionally concealed material facts from
Plaintiff(s) for the purpose of inducing Plaintiff(s) to engage in the mortgages pursuant to
the Defendant(s)' deceptive marketing scheme. Said concealment by the Defendants
was calculated, willful and intentional and renders Defendant(s) liable to Plaintiffs for
actual and punitive damages as though said Defendant(s) had affirmatively stated the

non-existence of the matters said Defendant(s) concealed. The acts of said Defendant(s) as aforesaid render said Defendant(s) liable to Plaintiffs and causes of action are hereby stated for fraudulent concealment.

5. Defendants' conduct constitutes a civil conspiracy thereby making all and/or some of the Defendant(s) equally liable for the conduct of all and/or some other Defendant(s) jointly and severally acts.

145. As a direct and proximate result of the LOFTUS; FARROW; PIERCE; FDIC; UPB; SHOREBANK; C & T; EURICH; VCP; SCULLY; LYONS; SIMKO; CHICAGO; SWANSON JR.; LASALLE BANK; MERS; ENCORE; EMC; BEAR STEARNS; NATIONSTAR; CITIMORTGAGE; BEAR STEARNS 2007-HE6; FNM; FIRST FRANKLEN; US BANK; VARAK; GOMEZ; KS&N; FREEMAN; LESNIAK; MARKS; MEYERSON; BWMACKAY& S; CHRISTINA PLACE II; MITCHELL; SOLGANICK; WHITE; ROWELL; SBZ&R; CODILIS; COOK COUNTY SHERIFF'S; PASQUESI; J. AVGERINOS; P. AVGERINOS; BABCOCK; HUBBARD; HR&O and PIERCE violations of Marvin Faulkner and Samuel C. Umunna, Constitutional Rights, as well as, violating the 2nd, 4th, 5th and 14th Amendments Rights of Marvin Faulkner and Samuel C. Umunna, **have** suffered severe and substantial damages. These damages include loss of income, loss of benefits, loss of investments, diminished earnings capacity, loss of career and business opportunities, litigation expenses including attorney fees, loss of reputation, humiliation, intimidation, embarrassment, inconvenience, mental and emotional anguish and distress and other compensatory damages, in an amount to be determined by a jury and the Court.

WHEREFORE, Plaintiffs are requesting in the amount of Four Million

Nine Hundred Five Thousand Seven Hundred Seventy-One Dollars and Eight-Seven Cents (\$4,905,771.87) in actual damages. (TO BE DETERMINED) in compensatory damages. Fourteen Million Seven Hundred Seventeen Thousand Three Hundred Fifteen Dollars and Sixty-One cents (\$14,717,315.61) in treble damages and Forty Million Dollars (\$40,000,000.00) in punitive damages; releasing Plaintiffs, Marvin Faulkner and Samuel C. Umunna from harm by the defendant(s); attorney's fees and costs (if applicable) and any other just remedy that this Honorable Court believes is just and in favor of the Plaintiffs.

AND, Plaintiffs prays for judgment against Defendant(s), herein listed above in count I, and each of them as follows:

1. For threefold the damages actually sustained and the costs of suit, in a sum not less than Four Million Nine Hundred Five Thousand Seven Hundred Seventy-One Dollars and Eight-Seven Cents [\$4,905,771.87], including a reasonable attorney's fee, (if applicable) pursuant to 18 USCA §1964 (c) with interest there at the rate of Seven percent (7%) per annum;
2. For such other and further relief as the Jury/Court may deem appropriate pursuant to 18 USCA §1964;
3. For such other and further relief as the Jury/Court may deem appropriate pursuant to 18 USCA §1964;

COUNT II - 18 U. S. C § 242

Violation of Plaintiffs' Federal and Legal Rights

146. Plaintiffs, Marvin Faulkner and Samuel C. Umunna, incorporates and restates each of the above paragraphs [in reference each allegation in all of the above sections,

paragraphs, and sub-paragraphs] as if fully set forth herein this count.

147. ANNA M. LOFTUS; WILLIAM FARROW; PIERCE & ASSOCIATES;
FEDERAL DEPOSIT INSURANCE CORPORATION; URBAN PARTNERSHIP
BANK; SHOREBANK; JENNER & BLOCK LLP; CHUHAK & TECSON, P.C.;
MICHAEL A. EURICH; VILLA CAPITAL PROPERTIES; GEORGE F. SCULLY JR.;
ELIZABETH LYONS; DARRLY B. SIMKO; CITY OF CHICAGO; ALFRED M.
SWANSON JR.; LASALLE BANK NATIONAL, as trustee for Certificate holders of
Bear Stearns Asset Back Securities I, LLC, Asset-Backed; Certificates, Series 2007-HE6;
MORTGAGE ELECTRONIC REGISTRATION SYSTEMS; ENCORE CREDIT; EMC
MORTGAGE CORPORATION; BEAR STEARNS ASSET BACKED SECURITIES I
LLC; NATIONSTAR MORTGAGE, LLC; CITIMORTGAGE, INC.; BEAR STEARNS
ASSET BACKED SECURITIES I TRUST 2007-HE6; FEDERAL NATIONAL
MORTGAGE ASSOCIATION; FIRST FRANKLEN MORTGAGE; US BANK
NATIONAL ASSOCIATES; MICHAEL N. VARAK; BRYAN GOMEZ; KOVITZ,
SHIFRIN & NESBIT LAW OFFICE; MEREDITH FREEMAN; EDWARD J.
LESNIAK; ALEXANDER D. MARKS; PAMELA MCLEAN MEYERSON; BURKE,
WARREN, MACKAY & SERRITELLA, P.C.; CHRISTINA PLACE II
CONDOMINIUM ASSOCIATION; RAYMOND W. MITCHELL; IRWIN J.
SOLGANICK; ALEXANDER P. WHITE; TIMOTHY L. ROWELL; STARR,
BEJGIERT, ZINK & ROWELL; CODILIS & ASSOCIATES; COOK COUNTY
SHERIFF'S POLICE DEPARTMENT; SONIA PASQUESI; JOHN AVGERINOS;
PAUL AVGERINOS; SAMANTHA L. BABCOCK; ERIK HUBBARD;
HAUSELMAN, RAPPIN & OLSWANG, LTD *and* RODERICK PIERCE **have** acted

under the color of law when LOFTUS; FARROW; PIERCE; FDIC; UPB;
SHOREBANK; C & T; EURICH; VCP; SCULLY; LYONS; SIMKO; CHICAGO;
SWANSON JR.; LASALLE BANK; MERS; ENCORE; EMC; BEAR STEARNS;
NATIONSTAR; CITIMORTGAGE; BEAR STEARNS 2007-HE6; FNM; FIRST
FRANKLEN; US BANK; VARAK; GOMEZ; KS&N; FREEMAN; LESNIAK;
MARKS; MEYERSON; BWMACKAY& S; CHRISTINA PLACE II; MITCHELL;
SOLGANICK; WHITE; ROWELL; SBZ&R; CODILIS; COOK COUNTY SHERIFF'S;
PASQUESI; J. AVGERINOS; P. AVGERINOS; BABCOCK; HUBBARD; HR&O *and*
PIERCE deprived Plaintiff of **their** Constitutional Rights, as well as, violating
the 2nd, 4th, 5th and 14th Amendments Rights federal rights, property interests and
otherwise discriminated against Marvin Faulkner and Samuel C. Umunna, based upon the
illicit acts by the LOFTUS; FARROW; PIERCE; FDIC; UPB; SHOREBANK; C & T;
EURICH; VCP; SCULLY; LYONS; SIMKO; CHICAGO; SWANSON JR.; LASALLE
BANK; MERS; ENCORE; EMC; BEAR STEARNS; NATIONSTAR;
CITIMORTGAGE; BEAR STEARNS 2007-HE6; FNM; FIRST FRANKLEN; US
BANK; VARAK; GOMEZ; KS&N; FREEMAN; LESNIAK; MARKS; MEYERSON;
BWMACKAY& S; CHRISTINA PLACE II; MITCHELL; SOLGANICK; WHITE;
ROWELL; SBZ&R; CODILIS; COOK COUNTY SHERIFF'S; PASQUESI; J.
AVGERINOS; P. AVGERINOS; BABCOCK; HUBBARD; HR&O *and* PIERCE.

148. As a direct and proximate result of LOFTUS; FARROW; PIERCE; FDIC; UPB;
SHOREBANK; C & T; EURICH; VCP; SCULLY; LYONS; SIMKO; CHICAGO;
SWANSON JR.; LASALLE BANK; MERS; ENCORE; EMC; BEAR STEARNS;
NATIONSTAR; CITIMORTGAGE; BEAR STEARNS 2007-HE6; FNM; FIRST

FRANKLEN; US BANK; VARAK; GOMEZ; KS&N; FREEMAN; LESNIAK;
MARKS; MEYERSON; BWMACKAY& S; CHRISTINA PLACE II; MITCHELL;
SOLGANICK; WHITE; ROWELL; SBZ&R; CODILIS; COOK COUNTY SHERIFF'S;
PASQUESI; J. AVGERINOS; P. AVGERINOS; BABCOCK; HUBBARD; HR&O and
PIERCE *Violation of 18 U.S.C. §242*, Marvin Faulkner and Samuel C. Umunna, **has**
sustained injuries and/or damages.

a. The Plaintiff(s) is targeted and harmed physically, by illness and
emotionally distress of the illicit plot by the Defendant(s).

b. The Plaintiff(s) have suffered extreme financial damages as
aforementioned in this "*Second Amended Verified Complaint*".

c. The Plaintiffs believe that their telephones and computers are being tap
by the Defendant(s).

149. That continually from the period of 2008 and 2017 of this "*Second Amended
Verified Complaint*" Defendant(s), as a result that, the Plaintiffs exercised their
constitutional, State and local rights to defend themselves and their properties against
corruption against the Defendant(s), as aforementioned.

150. The Defendant(s), herein, both directly and indirectly, individually and through its
agents, servants and employees, herein in this Count XI §1986 Conspiracy well knowing
its duty in this regard, under the color of law, carelessly and prior thereto, caused and
permitted said harm to become and remain against the Plaintiffs.

151. That during the period of 2008 thru 2017 of this "*Second Amended Verified
Complaint*" Plaintiffs filed complaints with the FBI, the Judicial Board, to the Circuit of
Cook County, the United States District Court for the Northern District of Illinois,

Eastern Division for protection against the Plaintiffs from the Defendant(s) on many occasion, Plaintiffs had warned the Defendant(s) their harm to the Plaintiffs.

152. That the Defendant(s) by its servants, agents and employees was then and there guilty of one or more of the following harms, negligent acts and/or omissions:

a). Defendant(s) acts towards/to the Plaintiffs due to the Plaintiffs color and/or race being: African American is Unconstitutional under United States Laws.

b). Plaintiff(s) [as Anna M. Loftus said to Faulkner: "Nigger, I'm going to enjoy destroying you!!!" on February 03, 2015] is being punished for being African American.

153. That by reason of the set forth in the "*Second Amended Verified Complaint*" of paragraphs set forth above as a result of the aforesaid intention and directly or indirectly, of the said Defendants, as a result that Plaintiffs, Marvin Faulkner and/or Samuel C. Umunna, was caused to suffer divers temporary and permanent fear and harm to their way of life, bodies, financial depletion, their reputation, their ability of life, liberty and the pursuant of happiness. Plaintiff has been and will be prevented from attending to their usual affairs and duties and has lost and will continue to lose great gains they would otherwise have made and acquired.

154. As a direct and proximate result of the LOFTUS; FARROW; PIERCE; FDIC; UPB; SHOREBANK; C & T; EURICH; VCP; SCULLY; LYONS; SIMKO; CHICAGO; SWANSON JR.; LASALLE BANK; MERS; ENCORE; EMC; BEAR STEARNS; NATIONSTAR; CITIMORTGAGE; BEAR STEARNS 2007-HE6; FNM; FIRST FRANKLEN; US BANK; VARAK; GOMEZ; KS&N; FREEMAN; LESNIAK; MARKS; MEYERSON; BWMACKAY& S; CHRISTINA PLACE II; MITCHELL; SOLGANICK; WHITE; ROWELL; SBZ&R; CODILIS; COOK COUNTY SHERIFF'S;

PASQUESI; J. AVGERINOS; P. AVGERINOS; BABCOCK; HUBBARD; HR&O *and* PIERCE violations of Marvin Faulkner and Samuel C. Umunna, constitutional rights, Marvin Faulkner and Samuel C. Umunna, **have** suffered severe and substantial damages. These damages include loss of income, loss of benefits, loss of investments, diminished earnings capacity, loss of career and business opportunities, litigation expenses including attorney fees, loss of reputation, humiliation, intimidation, embarrassment, inconvenience, mental and emotional anguish and distress and other compensatory damages, in an amount to be determined by a jury and the Court.

WHEREFORE, Plaintiffs are requesting against the Defendant(s) and in Favor of the Plaintiffs in the amount of Four Million Nine Hundred Five Thousand Seven Hundred Seventy-One Dollars and Eight-Seven Cents (**\$4,905,771.87**) in actual damages. (TO BE DETERMINED) in compensatory damages. Fourteen Million Seven Hundred Seventeen Thousand Three Hundred Fifteen Dollars and Sixty-One cents (**\$14,717,315.61**) in treble damages and Forty Million Dollars (**\$40,000,000.00**) in punitive damages; releasing Plaintiffs, Marvin Faulkner and Samuel C. Umunna from harm by the defendant(s); attorney's fees and costs (*if applicable*) and any other just remedy that this Honorable Court believes is just and in favor of the Plaintiffs.

COUNT III - INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

Violation of Plaintiffs' Federal and Legal Rights

155. Plaintiffs, Marvin Faulkner and Samuel C. Umunna, incorporates and restates each of the above paragraphs [in reference each allegation in all of the above sections, paragraphs, and sub-paragraphs] as if fully set forth herein this count.

156. ANNA M. LOFTUS; WILLIAM FARROW; MICHAEL A. EURICH; GEORGE F. SCULLY JR.; ELIZABETH LYONS; DARRLY B. SIMKO; ALFRED M.

SWANSON JR.; MICHAEL N. VARAK; BRYAN GOMEZ; MEREDITH FREEMAN; EDWARD J. LESNIAK; ALEXANDER D. MARKS; PAMELA MCLEAN MEYERSON; RAYMOND W. MITCHELL; IRWIN J. SOLGANICK; ALEXANDER P. WHITE; TIMOTHY L. ROWELL; SONIA PASQUESI; JOHN AVGERINOS; PAUL AVGERINOS; SAMANTHA L. BABCOCK; ERIK HUBBARD; *and* RODERICK PIERCE **have** acted under the color of law when LOFTUS; FARROW; EURICH; SCULLY; LYONS; SIMKO; SWANSON JR.; VARAK; GOMEZ; FREEMAN; LESNIAK; MARKS; MEYERSON; MITCHELL; SOLGANICK; WHITE; ROWELL; PASQUESI; J. AVGERINOS; P. AVGERINOS; BABCOCK; HUBBARD *and* PIERCE deprived Plaintiff of **their** Constitutional Rights, as well as, violating the 2nd, 4th, 5th and 14th Amendments Rights federal rights, property interests and otherwise discriminated against Marvin Faulkner and Samuel C. Umunna, based upon the illicit acts by the LOFTUS; FARROW; PIERCE; EURICH; SCULLY; LYONS; SIMKO; SWANSON JR.; VARAK; GOMEZ; FREEMAN; LESNIAK; MARKS; MEYERSON; MITCHELL; SOLGANICK; WHITE; ROWELL; PASQUESI; J. AVGERINOS; P. AVGERINOS; BABCOCK; HUBBARD; *and* PIERCE.

157. As a direct and proximate result of LOFTUS; FARROW; EURICH; SCULLY; LYONS; SIMKO; SWANSON JR.; VARAK; GOMEZ; FREEMAN; LESNIAK; MARKS; MEYERSON; MITCHELL; SOLGANICK; WHITE; ROWELL; PASQUESI; J. AVGERINOS; P. AVGERINOS; BABCOCK; HUBBARD *and* PIERCE *Violation of Emotional Distress*, Marvin Faulkner and Samuel C. Umunna, **have** sustained injuries and/or damages.

- a. The Plaintiff(s) is targeted and harmed physically, by illness and

emotionally distress of the illicit plot by the Defendant(s).

b. The Plaintiff(s) have suffered extreme financial damages as
aforementioned in this "*Second Amended Verified Complaint*".

c. The Plaintiffs telephones and computers appears tapped.

158. That continually from the period of 2008 and 2017 of this "*Second Amended Verified Complaint*" defendants, as a result that, the Plaintiffs exercised their Constitutional, State and Local Rights to defend themselves and their properties against corruption against the Defendants, as aforementioned.

159. The Defendant(s), herein, both directly and indirectly, individually and through its agents, servants and employees, herein in this Count XI §1986 Conspiracy well knowing its duty in this regard, under the color of law, carelessly and prior thereto, caused and permitted said harm to become and remain against the Plaintiffs.

160. That during the period of 2008 thru 2017 of this "*Second Amended Verified Complaint*" Plaintiffs filed complaints with the FBI, the Judicial Board, to the Circuit of Cook County, the United States District Court for the Northern District of Illinois, Eastern Division for protection against the Plaintiffs from the defendants on many occasion, Plaintiffs had warned the Defendant, of their harm to the Plaintiffs.

161. That the Defendants by its servants, agents and employees were then and there guilty of one or more of the following harms, negligent acts and/or omissions:

a). Defendant(s) in their conspiracy/plot to defraud Plaintiffs by damaging the Plaintiffs' way of life of the Defendant(s)' intimidation, using color of law to aid the goals of the Defendants' purpose of ill-gotten gain forced the Plaintiffs to become afraid of everyday life, file bankruptcy, increase stress to the Plaintiffs, for Plaintiffs' aggressive legal litigation to defend Plaintiffs' person and properties.

162. That by reason of the set forth in this "*Second Amended Verified Complaint*" of

paragraphs, above as a result, of the aforesaid intention and directly or indirectly, of the said Defendants, as a result that, Plaintiffs, Marvin Faulkner and/or Samuel C. Umunna, was caused to suffer divers temporary and permanent fear and harm to their way of life, bodies, financial depletion, their reputation, their ability of life, liberty and the pursuant of happiness. Plaintiffs been and will be prevented from attending to their usual affairs and duties and has lost and will continue to lose great gains they would otherwise have made and acquired.

163. As a direct and proximate result of the LOFTUS; FARROW; EURICH; SCULLY; LYONS; SIMKO; SWANSON JR. VARAK; GOMEZ; FREEMAN; LESNIAK; MARKS; MEYERSON; MITCHELL; SOLGANICK; WHITE; ROWELL; PASQUESI; J. AVGERINOS; P. AVGERINOS; BABCOCK; HUBBARD *and* PIERCE violations of Marvin Faulkner and Samuel C. Umunna, Constitutional Rights, as well as, violating the 2nd, 4th, 5th and 14th Amendments Rights constitutional rights, Marvin Faulkner and Samuel C. Umunna, **have** suffered severe and substantial damages. These damages include loss of income, loss of benefits, loss of investments, diminished earnings capacity, loss of career and business opportunities, litigation expenses including attorney fees, loss of reputation, humiliation, intimidation, embarrassment, inconvenience, mental and emotional anguish and distress and other compensatory damages, in an amount to be determined by a jury and the Court.

WHEREFORE, Plaintiffs are requesting against the Defendant(s) and in Favor of the Plaintiffs in the amount of Four Million Nine Hundred Five Thousand Seven Hundred Seventy-One Dollars and Eight-Seven Cents (**\$4,905,771.87**) in actual damages. **(TO BE DETERMINED)** in compensatory damages. Fourteen Million Seven

Hundred Seventeen Thousand Three Hundred Fifteen Dollars and Sixty-One cents (\$14,717,315.61) in treble damages and Forty Million Dollars (\$40,000,000.00) in punitive damages; releasing Plaintiffs, Marvin Faulkner and Samuel C. Umunna from harm by the defendant(s); attorney's fees and costs (*if applicable*) and any other just remedy that this Honorable Court believes is just and in favor of the Plaintiffs.

COUNT IV - INTIMIDATION

Violation of Plaintiffs' Federal and Legal Rights

164. Plaintiffs, Marvin Faulkner and Samuel C. Umunna, incorporates and restates each of the above paragraphs [in reference each allegation in all of the above sections, paragraphs, and sub-paragraphs] as if fully set forth herein this count.

165. ANNA M. LOFTUS; MICHAEL A. EURICH; DARRLY B. SIMKO; CITY OF CHICAGO; ALFRED M. SWANSON JR.; RAYMOND W. MITCHELL; COOK COUNTY SHERIFF'S POLICE DEPARTMENT; SAMANTHA L. BABCOCK; ERIK HUBBARD *and* RODERICK PIERCE **have** acted under the color of law when LOFTUS; EURICH; SIMKO; CHICAGO; SWANSON JR.; MITCHELL; COOK COUNTY SHERIFF'S; BABCOCK; HUBBARD; *and* PIERCE deprived Plaintiff of **their** Constitutional Rights, as well as, violating the 2nd, 4th, 5th and 14th Amendments Rights federal rights, property interests and otherwise discriminated against [Marvin Faulkner and Samuel C. Umunna, based upon the illicit acts by the LOFTUS; EURICH; SIMKO; CHICAGO; SWANSON JR.; MITCHELL; COOK COUNTY SHERIFF'S; BABCOCK; HUBBARD; *and* PIERCE

166. As a direct and proximate result of LOFTUS; EURICH; SIMKO; CHICAGO; SWANSON JR.; MITCHELL; COOK COUNTY SHERIFF'S; BABCOCK; HUBBARD; *and* PIERCE *Violation of Intimidation*, Marvin Faulkner and Samuel C.

Umunna, **have** sustained injuries and/or damages.

a. The Plaintiff(s) is targeted and harmed physically, by illness and emotionally distress of the illicit plot by the Defendant(s).

b. The Plaintiff(s) have suffered extreme financial damages as aforementioned in this "*Second Amended Verified Complaint*".

c. The Plaintiffs believe that their telephones and computers are being tap by the Defendant(s).

167. That continually from the period of 2008 and 2017 of this "*Second Amended Verified Complaint*" Defendant(s), as a result that, the Plaintiffs exercised their constitutional, State and local rights to defend themselves and their properties against corruption against the Defendants, as aforementioned.

168. The Defendant(s), herein, both directly and indirectly, individually and through its agents, servants and employees, herein in this Count XI §1986 Conspiracy well knowing its duty in this regard, under the color of law, carelessly and prior thereto, caused and permitted said harm to become and remain against the Plaintiffs.

169. That during the period of 2008 thru 2017 of this "*Second Amended Verified Complaint*" Plaintiffs filed complaints with the FBI, the Judicial Board, to the Circuit of Cook County, the United States District Court for the Northern District of Illinois, Eastern Division for protection against the Plaintiffs from the defendants on many occasions, Plaintiffs had warned the Defendant(s) of their harm, to the Plaintiffs.

170. That the Defendant(s) by its servants, agents and employees was then and there guilty of one or more of the following harms, negligent acts and/or omissions:

a). Plaintiffs directly of effect of the acts of the Defendant(s) made or had the

Plaintiffs arrested and degraded the Plaintiffs by people with guns, and on occasion said people holding the handle of their gun while looking at the Plaintiff(s).

b). Defendant(s) threaten and is threatening Plaintiffs liberty, lives and enjoyment of life aiming to hurt or embed fear in the Plaintiff(s) for their aggressive legal litigations.

171. That by reason of the set forth in this "*Second Amended Verified Complaint*" of paragraphs, above as a result of the aforesaid intention and directly or indirectly, of the said Defendants, as a result that, Plaintiffs, Marvin Faulkner and/or Samuel C. Umunna, was caused to suffer divers temporary and permanent fear and harm to their way of life, bodies, financial depletion, their reputation, their ability of life, liberty and the pursuant of happiness. Plaintiff has been and will be prevented from attending to their usual affairs and duties and has lost and will continue to lose great gains they would otherwise have acquired.

172. As a direct and proximate result of the LOFTUS; EURICH; SIMKO; CHICAGO; SWANSON JR.; MITCHELL; COOK COUNTY SHERIFF'S; BABCOCK; HUBBARD; and PIERCE violations of Marvin Faulkner and Samuel C. Umunna, constitutional rights, Marvin Faulkner and Samuel C. Umunna, **have** suffered severe and substantial damages. These damages include loss of income, loss of benefits, loss of investments, diminished earnings capacity, loss of career and business opportunities, litigation expenses including attorney fees, loss of reputation, humiliation, intimidation, embarrassment, inconvenience, mental and emotional anguish and distress and other compensatory damages, in an amount to be determined by a jury and the Court.

WHEREFORE, Plaintiffs are requesting against the Defendant(s) and in Favor of the Plaintiffs in the amount of Four Million Nine Hundred Five Thousand Seven

Hundred Seventy-One Dollars and Eight-Seven Cents (\$4,905,771.87) in actual damages. (TO BE DETERMINED) in compensatory damages. Fourteen Million Seven Hundred Seventeen Thousand Three Hundred Fifteen Dollars and Sixty-One cents (\$14,717,315.61) in treble damages and Forty Million Dollars (\$40,000,000.00) in punitive damages; releasing Plaintiffs, Marvin Faulkner and Samuel C. Umunna from harm by the defendant(s); attorney's fees and costs (*if applicable*) and any other just remedy that this Honorable Court believes is just and in favor of the Plaintiffs.

COUNT V - UNJUST ENRICHMENT

Violation of Plaintiffs' Federal and Legal Rights

173. Plaintiffs, Marvin Faulkner and Samuel C. Umunna, incorporates and restates each of the above paragraphs [in reference each allegation in all of the above sections, paragraphs, and sub-paragraphs] as if fully set forth herein this count.

174. ANNA M. LOFTUS; WILLIAM FARROW; PIERCE & ASSOCIATES; FEDERAL DEPOSIT INSURANCE CORPORATION; URBAN PARTNERSHIP BANK; SHOREBANK; JENNER & BLOCK LLP; CHUHAK & TECSON, P.C.; MICHAEL A. EURICH; VILLA CAPITAL PROPERTIES; GEORGE F. SCULLY JR.; ELIZABETH LYONS; DARRLY B. SIMKO; CITY OF CHICAGO; ALFRED M. SWANSON JR.; LASALLE BANK NATIONAL, as trustee for Certificate holders of Bear Stearns Asset Back Securities I, LLC, Asset-Backed; Certificates, Series 2007-HE6; MORTGAGE ELECTRONIC REGISTRATION SYSTEMS; ENCORE CREDIT; EMC MORTGAGE CORPORATION; BEAR STEARNS ASSET BACKED SECURITIES I LLC; NATIONSTAR MORTGAGE, LLC; CITIMORTGAGE, INC.; BEAR STEARNS ASSET BACKED SECURITIES I TRUST 2007-HE6; FEDERAL NATIONAL

MORTGAGE ASSOCIATION; FIRST FRANKLEN MORTGAGE; US BANK NATIONAL ASSOCIATES; MICHAEL N. VARAK; BRYAN GOMEZ; KOVITZ, SHIFRIN & NESBIT LAW OFFICE; MEREDITH FREEMAN; EDWARD J. LESNIAK; ALEXANDER D. MARKS; PAMELA MCLEAN MEYERSON; BURKE, WARREN, MACKAY & SERRITELLA, P.C.; CHRISTINA PLACE II CONDOMINIUM ASSOCIATION; RAYMOND W. MITCHELL; IRWIN J. SOLGANICK; ALEXANDER P. WHITE; TIMOTHY L. ROWELL; STARR, BEJGIERT, ZINK & ROWELL; CODILIS & ASSOCIATES; COOK COUNTY SHERIFF'S POLICE DEPARTMENT; SONIA PASQUESI; JOHN AVGERINOS; PAUL AVGERINOS; SAMANTHA L. BABCOCK; ERIK HUBBARD; HAUSELMAN, RAPPIN & OLSWANG, LTD *and* RODERICK PIERCE **have** acted under the color of law when LOFTUS; FARROW; PIERCE; FDIC; UPB; SHOREBANK; C & T; EURICH; VCP; SCULLY; LYONS; SIMKO; CHICAGO; SWANSON JR.; LASALLE BANK; MERS; ENCORE; EMC; BEAR STEARNS; NATIONSTAR; CITIMORTGAGE; BEAR STEARNS 2007-HE6; FNM; FIRST FRANKLEN; US BANK; VARAK; GOMEZ; KS&N; FREEMAN; LESNIAK; MARKS; MEYERSON; BWMACKAY& S; CHRISTINA PLACE II; MITCHELL; SOLGANICK; WHITE; ROWELL; SBZ&R; CODILIS; COOK COUNTY SHERIFF'S; PASQUESI; J. AVGERINOS; P. AVGERINOS; BABCOCK; HUBBARD; HR&O *and* PIERCE deprived Plaintiff of **their** Constitutional Rights, as well as, violating the 2nd, 4th, 5th and 14th Amendments Rights federal rights, property interests and otherwise discriminated against Marvin Faulkner and Samuel C. Umunna, based upon the illicit acts by the LOFTUS; FARROW; PIERCE; FDIC; UPB; SHOREBANK; C & T; EURICH;

VCP; SCULLY; LYONS; SIMKO; CHICAGO; SWANSON JR.; LASALLE BANK; MERS; ENCORE; EMC; BEAR STEARNS; NATIONSTAR; CITIMORTGAGE; BEAR STEARNS 2007-HE6; FNM; FIRST FRANKLEN; US BANK; VARAK; GOMEZ; KS&N; FREEMAN; LESNIAK; MARKS; MEYERSON; BWMACKAY& S; CHRISTINA PLACE II; MITCHELL; SOLGANICK; WHITE; ROWELL; SBZ&R; CODILIS; COOK COUNTY SHERIFF'S; PASQUESI; J. AVGERINOS; P. AVGERINOS; BABCOCK; HUBBARD; HR&O and PIERCE.

175. As a direct and proximate result of LOFTUS; FARROW; PIERCE; FDIC; UPB; SHOREBANK; C & T; EURICH; VCP; SCULLY; LYONS; SIMKO; CHICAGO; SWANSON JR.; LASALLE BANK; MERS; ENCORE; EMC; BEAR STEARNS; NATIONSTAR; CITIMORTGAGE; BEAR STEARNS 2007-HE6; FNM; FIRST FRANKLEN; US BANK; VARAK; GOMEZ; KS&N; FREEMAN; LESNIAK; MARKS; MEYERSON; BWMACKAY& S; CHRISTINA PLACE II; MITCHELL; SOLGANICK; WHITE; ROWELL; SBZ&R; CODILIS; COOK COUNTY SHERIFF'S; PASQUESI; J. AVGERINOS; P. AVGERINOS; BABCOCK; HUBBARD; HR&O and PIERCE *Violation of Unjust Enrichment*, Marvin Faulkner and Samuel C. Umunna, **have** sustained injuries and/or damages.

a. The Plaintiff(s) is targeted and harmed physically, by illness and emotionally distress of the illicit plot by the Defendant(s).

b. The Plaintiff(s) have suffered extreme financial damages as aforementioned in this "*Second Amended Verified Complaint*".

c. The Plaintiff believe that their telephones and computers are being tap by the Defendant(s).

176. Defendant(s) obtained funds and/or profits from the plaintiff(s) by fraud perpetrated by the Defendants and the taking of undue advantage of the Plaintiffs in the manner described above. Defendants' conduct gives rise to a cause of action on behalf of Plaintiffs under the equitable remedy of unjust enrichment, which cause of action is hereby stated.

177. That continually from the period of 2008 and 2017 of this "*Second Amended Verified Complaint*" Defendants, as a result that, the Plaintiffs exercised their constitutional, State and local rights to defend themselves and their properties against corruption against the Defendant(s), as aforementioned.

178. The Defendant(s), herein, both directly and indirectly, individually and through its agents, servants and employees, herein in this Count XI §1986 Conspiracy well knowing its duty in this regard, under the color of law, carelessly and prior thereto, caused and permitted said harm to become and remain against the Plaintiffs.

179. That during the period of 2008 thru 2017 of this second amended verified complaint plaintiff filed complaints with the FBI, the Judicial Board, to the Circuit of Cook County, the United States District Court for the Northern District of Illinois, Eastern Division for protection against the plaintiffs from the defendants on many occasion. Plaintiffs had warned the Defendant(s) of their harm they are perpetrating on the Plaintiffs, to no prevail.

180. That the Defendant(s) by its servants, agents and employees was then and there guilty of one or more of the following harms, negligent acts and/or omissions:

a). Defendant(s) enriched their stature, financial enlargements and camaraderie from the Defendant(s) plot to defraud and destroy the Plaintiffs.

b). Defendant(s) received benefit and favors of the system that surpassed the rights of the regular citizens by the rules of law; for their plot against the Plaintiffs.

181. That by reason of the set forth in the "*Second Amended Verified Complaint*" of paragraphs above as a result of the aforesaid intention and directly or indirectly, of the said Defendants, as a result that, Plaintiffs, Marvin Faulkner and/or Samuel C. Umunna, was caused to suffer divers temporary and permanent fear and harm to their way of life, bodies, financial depletion, their reputation, their ability of life, liberty and the pursuant of happiness. Plaintiff has been and will be prevented from attending to their usual affairs and duties and has lost and will continue to lose great gains they would otherwise have acquired.

182. As a direct and proximate result of the LOFTUS; FARROW; PIERCE; FDIC; UPB; SHOREBANK; C & T; EURICH; VCP; SCULLY; LYONS; SIMKO; CHICAGO; SWANSON JR.; LASALLE BANK; MERS; ENCORE; EMC; BEAR STEARNS; NATIONSTAR; CITIMORTGAGE; BEAR STEARNS 2007-HE6; FNM; FIRST FRANKLEN; US BANK; VARAK; GOMEZ; KS&N; FREEMAN; LESNIAK; MARKS; MEYERSON; BWMACKAY& S; CHRISTINA PLACE II; MITCHELL; SOLGANICK; WHITE; ROWELL; SBZ&R; CODILIS; COOK COUNTY SHERIFF'S; PASQUESI; J. AVGERINOS; P. AVGERINOS; BABCOCK; HUBBARD; HR&O and PIERCE violations of Marvin Faulkner and Samuel C. Umunna, Constitutional Rights, as well as, violating the 2nd, 4th, 5th and 14th Amendments Rights constitutional rights, Marvin Faulkner and Samuel C. Umunna, **have** suffered severe and substantial damages. These damages include loss of income, loss of benefits, loss of investments, diminished earnings capacity, loss of career and business opportunities, litigation expenses including

attorney fees, loss of reputation, humiliation, intimidation, embarrassment, inconvenience, mental and emotional anguish and distress and other compensatory damages, in an amount to be determined by a jury and the Court.

WHEREFORE, Plaintiffs are requesting against the Defendant(s) and in Favor of the Plaintiffs in the amount of Four Million Nine Hundred Five Thousand Seven Hundred Seventy-One Dollars and Eight-Seven Cents (**\$4,905,771.87**) in actual damages. (**TO BE DETERMINED**) in compensatory damages. Fourteen Million Seven Hundred Seventeen Thousand Three Hundred Fifteen Dollars and Sixty-One cents (**\$14,717,315.61**) in treble damages and Forty Million Dollars (**\$40,000,000.00**) in punitive damages; releasing Plaintiffs, Marvin Faulkner and Samuel C. Umunna from harm by the defendant(s); attorney's fees and costs (*if applicable*) and any other just remedy that this Honorable Court believes is just and in favor of the Plaintiffs.

COUNT VI - INTENTIONAL TORT
Violation of Plaintiffs' Federal and Legal Rights

183. Plaintiffs, Marvin Faulkner and Samuel C. Umunna, incorporates and restates each of the above paragraphs [in reference each allegation in all of the above sections, paragraphs, and sub-paragraphs] as if fully set forth herein this count.

184. ANNA M. LOFTUS; PIERCE & ASSOCIATES; URBAN PARTNERSHIP BANK; JENNER & BLOCK LLP; CHUHAK & TECSON, P.C.; MICHAEL A. EURICH; VILLA CAPITAL PROPERTIES; GEORGE F. SCULLY JR.; ELIZABETH LYONS; DARRLY B. SIMKO; CITY OF CHICAGO; ALFRED M. SWANSON JR.; LASALLE BANK NATIONAL, ENCORE CREDIT; EMC MORTGAGE CORPORATION; NATIONSTAR MORTGAGE, LLC; CITIMORTGAGE, INC.; BEAR STEARNS ASSET BACKED SECURITIES I TRUST 2007-HE6; FEDERAL

NATIONAL MORTGAGE ASSOCIATION; FIRST FRANKLEN MORTGAGE; US BANK NATIONAL ASSOCIATES; MICHAEL N. VARAK; BRYAN GOMEZ; KOVITZ, SHIFRIN & NESBIT LAW OFFICE; MEREDITH FREEMAN; EDWARD J. LESNIAK; ALEXANDER D. MARKS; PAMELA MCLEAN MEYERSON; BURKE, WARREN, MACKAY & SERRITELLA, P.C.; CHRISTINA PLACE II CONDOMINIUM ASSOCIATION; RAYMOND W. MITCHELL; IRWIN J. SOLGANICK; ALEXANDER P. WHITE; TIMOTHY L. ROWELL; STARR, BEJGIERT, ZINK & ROWELL; CODILIS & ASSOCIATES; COOK COUNTY SHERIFF'S POLICE DEPARTMENT; SONIA PASQUESI; JOHN AVGERINOS; PAUL AVGERINOS; SAMANTHA L. BABCOCK; ERIK HUBBARD; HAUSELMAN, RAPPIN & OLSWANG, LTD *and* RODERICK PIERCE] [has/have] acted under the color of law when LOFTUS; PIERCE; UPB; C & T; EURICH; VCP; SCULLY; LYONS; SIMKO; CHICAGO; SWANSON JR.; LASALLE BANK; ENCORE; NATIONSTAR; CITIMORTGAGE; BEAR STEARNS 2007-HE6; FNM; FIRST FRANKLEN; US BANK; VARAK; GOMEZ; KS&N; FREEMAN; LESNIAK; MARKS; MEYERSON; BWMACKAY& S; CHRISTINA PLACE II; MITCHELL; SOLGANICK; WHITE; ROWELL; SBZ&R; CODILIS; COOK COUNTY SHERIFF'S; PASQUESI; J. AVGERINOS; P. AVGERINOS; BABCOCK; HUBBARD; HR&O *and* PIERCE deprived Plaintiff of **their** Constitutional Rights, as well as, violating the 2nd, 4th, 5th and 14th Amendments Rights federal rights, property interests and otherwise discriminated against Marvin Faulkner and Samuel C. Umunna, based upon the illicit acts by the LOFTUS; PIERCE; UPB; C & T; EURICH; VCP; SCULLY; LYONS; SIMKO; CHICAGO; SWANSON JR.; LASALLE BANK; ENCORE; NATIONSTAR;

CITIMORTGAGE; BEAR STEARNS 2007-HE6; FNM; FIRST FRANKLEN; US BANK; VARAK; GOMEZ; KS&N; FREEMAN; LESNIAK; MARKS; MEYERSON; BWMACKAY& S; CHRISTINA PLACE II; MITCHELL; SOLGANICK; WHITE; ROWELL; SBZ&R; CODILIS; COOK COUNTY SHERIFF'S; PASQUESI; J. AVGERINOS; P. AVGERINOS; BABCOCK; HUBBARD; HR&O *and* PIERCE.

185. As a direct and proximate result of LOFTUS; PIERCE; UPB; C & T; EURICH; VCP; SCULLY; LYONS; SIMKO; CHICAGO; SWANSON JR.; LASALLE BANK; ENCORE; NATIONSTAR; CITIMORTGAGE; BEAR STEARNS 2007-HE6; FNM; FIRST FRANKLEN; US BANK; VARAK; GOMEZ; KS&N; FREEMAN; LESNIAK; MARKS; MEYERSON; BWMACKAY& S; CHRISTINA PLACE II; MITCHELL; SOLGANICK; WHITE; ROWELL; SBZ&R; CODILIS; COOK COUNTY SHERIFF'S; PASQUESI; J. AVGERINOS; P. AVGERINOS; BABCOCK; HUBBARD; HR&O *and* PIERCE *Violation of Intentional Tort*, Marvin Faulkner and Samuel C. Umunna, **have** sustained injuries and/or damages.

a. The Plaintiff(s) is targeted and harmed physically, by illness and emotionally distress of the illicit plot by the Defendant(s).

b. The Plaintiff(s) have suffered extreme financial damages as aforementioned in this "*Second Amended Verified Complaint*".

c. The Plaintiffs believe that their telephones and computers are being tap by the Defendant(s).

186. That continually from the period of 2008 and 2017 of this "*Second Amended Verified Complaint*" Defendant(s), as a result that, the plaintiffs exercised their constitutional, State and local rights to defend themselves and their properties against

corruption against the Defendant(s), as aforementioned.

187. The Defendant(s), herein, both directly and indirectly, individually and through its agents, servants and employees, herein in this Count XI §1986 Conspiracy well knowing its duty in this regard, under the color of law, carelessly and prior thereto, caused and permitted said harm to become and remain against the Plaintiffs.

188. That during the period of 2008 thru 2017 of this "*Second Amended Verified Complaint*" Plaintiffs filed complaints with the FBI, the Judicial Board, to the Circuit of Cook County, the United States District Court for the Northern District of Illinois, Eastern Division for protection against the plaintiffs from the defendants on many occasions, Plaintiffs had warned the Defendant(s) of their harm to the Plaintiffs.

189. That the Defendant(s) by its servants, agents and employees was then and there guilty of one or more of the following harms, negligent acts and/or omissions:

a). Defendant(s) of their free minds and bodies plotted against Plaintiffs for the purpose to defraud Plaintiffs' properties and gains for the use of the Defendant(s).

b). Defendant(s) knew or should have known that the harm the Defendant(s) perpetrated against the Plaintiffs would cause extreme harm to the Plaintiffs.

190. That by reason of the set forth in this "*Second Amended Verified Complaint*" of paragraphs, above as a result of the aforesaid intention and directly or indirectly, of the said Defendant(s), as a result that, Plaintiffs, Marvin Faulkner and/or Samuel C. Umunna, was caused to suffer divers temporary and permanent fear and harm to their way of life, bodies, financial depletion, their reputation, their ability of life, liberty and the pursuant of happiness. Plaintiffs have been and will be prevented from attending to their usual affairs and duties and has lost and will continue to lose great gains they would otherwise

have acquired.

191. As a direct and proximate result of the LOFTUS; PIERCE; UPB; C & T; EURICH; VCP; SCULLY; LYONS; SIMKO; CHICAGO; SWANSON JR.; LASALLE BANK; ENCORE; NATIONSTAR; CITIMORTGAGE; BEAR STEARNS 2007-HE6; FNM; FIRST FRANKLEN; US BANK; VARAK; GOMEZ; KS&N; FREEMAN; LESNIAK; MARKS; MEYERSON; BWMACKAY& S; CHRISTINA PLACE II; MITCHELL; SOLGANICK; WHITE; ROWELL; SBZ&R; CODILIS; COOK COUNTY SHERIFF'S; PASQUESI; J. AVGERINOS; P. AVGERINOS; BABCOCK; HUBBARD; HR&O and PIERCE violations of Marvin Faulkner and Samuel C. Umunna, Constitutional Rights, as well as, violating the 2nd, 4th, 5th and 14th Amendments Rights constitutional rights, Marvin Faulkner and Samuel C. Umunna, **have** suffered severe and substantial damages. These damages include loss of income, loss of benefits, loss of investments, diminished earnings capacity, loss of career and business opportunities, litigation expenses including attorney fees, loss of reputation, humiliation, intimidation, embarrassment, inconvenience, mental and emotional anguish and distress and other compensatory damages, in an amount to be determined by a jury and the Court.

WHEREFORE, Plaintiffs are requesting against the Defendant(s) and in Favor of the Plaintiffs in the amount of Four Million Nine Hundred Five Thousand Seven Hundred Seventy-One Dollars and Eight-Seven Cents (**\$4,905,771.87**) in actual damages. (**TO BE DETERMINED**) in compensatory damages. Fourteen Million Seven Hundred Seventeen Thousand Three Hundred Fifteen Dollars and Sixty-One cents (**\$14,717,315.61**) in treble damages and Forty Million Dollars (**\$40,000,000.00**) in punitive damages; releasing Plaintiffs, Marvin Faulkner and Samuel C. Umunna from

harm by the defendant(s); attorney's fees and costs (*if applicable*) and any other just remedy that this Honorable Court believes is just and in favor of the Plaintiffs.

COUNT VII – HATE CRIME: 18 U. S. CODE § 249
Violation of Plaintiffs' Federal and Legal Rights

192. Plaintiff(s), Marvin Faulkner, incorporates and restates each of the above paragraphs [in reference each allegation in all of the above sections, paragraphs, and sub-paragraphs] as if fully set forth herein this count.

193. ANNA M. LOFTUS **has** acted under the color of law when LOFTUS; deprived Plaintiff of **his** Constitutional Rights, as well as, violating the 2nd, 4th, 5th and 14th Amendments Rights federal rights, property interests and otherwise discriminated against Marvin Faulkner based upon the illicit acts by the LOFTUS.

194. As a direct and proximate result of LOFTUS *Violation of Hate Crime*, Marvin Faulkner **has** sustained injuries and/or damages.

a. The Plaintiff(s) is targeted and harmed physically, by illness and emotionally distress of the illicit plot by the Defendant(s).

b. The Plaintiff(s) have suffered extreme financial damages as aforementioned in this "*Second Amended Verified Complaint*".

c. The Plaintiffs believe that their telephones and computers are being tap by the Defendant(s).

195. That continually from the period of 2008 and 2017 of this "*Second Amended Verified Complaint*" Defendant(s), as a result that, the plaintiffs exercised their constitutional, State and local rights to defend themselves and their properties against corruption against the Defendant(s), as aforementioned.

196. The Defendant(s), herein, both directly and indirectly, individually and through its agents, servants and employees, herein in this Count XI §1986 Conspiracy well knowing its duty in this regard, under the color of law, carelessly and prior thereto, caused and permitted said harm to become and remain against the plaintiffs.

197. That during the period of 2008 thru 2017 of this second amended verified complaint plaintiff filed with the FBI, the Judicial Board, to the Circuit of Cook County, the United States District Court for the Northern District of Illinois, Eastern Division for protection against the plaintiffs from the defendants on many occasion, Plaintiffs had warned the Defendant(s) of their harm to the Plaintiff(s).

198. That the defendants by its servants, agents and employees were then and there guilty of one or more of the following harms, negligent acts and/or omissions:

a). Defendant(s) willfully created the Plaintiff(s) to suffer that the Plaintiff(s) have not found a white people/person to have/has suffered.

b). Defendant(s) have systematically orchestrated the demise of the Plaintiffs way of life primarily believed by Plaintiff(s) is/are due to Plaintiffs being African Americans.

199. That by reason of the set forth in the "*Second Amended Verified Complaint*" of paragraphs set forth above of the aforesaid intention and directly or indirectly, of the said Defendant(s), as a result that, Plaintiffs, Marvin Faulkner and/or Samuel C. Umunna, was caused to suffer divers temporary and permanent fear and harm to their way of life, bodies, financial depletion, their reputation, their ability of life, liberty and the pursuant of happiness. Plaintiffs have been and will be prevented from attending to their usual affairs and duties and has lost and will continue to lose great gains they would otherwise have made and acquired.

200. As a direct and proximate result of the LOFTUS violations of Marvin Faulkner constitutional rights, Marvin Faulkner **has** suffered severe and substantial damages. These damages include loss of income, loss of benefits, loss of investments, diminished earnings capacity, loss of career and business opportunities, litigation expenses including attorney fees, loss of reputation, humiliation, intimidation, embarrassment, inconvenience, mental and emotional anguish and distress and other compensatory damages, in an amount to be determined by a jury and the Court.

WHEREFORE, Plaintiffs are requesting against the Defendant(s) and in Favor of the Plaintiff Marvin Faulkner in the amount of Four Million Nine Hundred Five Thousand Seven Hundred Seventy-One Dollars and Eight-Seven Cents (**\$4,905,771.87**) in actual damages. (**TO BE DETERMINED**) in compensatory damages. Fourteen Million Seven Hundred Seventeen Thousand Three Hundred Fifteen Dollars and Sixty-One cents (**\$14,717,315.61**) in treble damages and Forty Million Dollars (**\$40,000,000.00**) in punitive damages; releasing Plaintiff Marvin Faulkner and from harm by the defendant(s); attorney's fees and costs (*if applicable*) and any other just remedy that this Honorable Court believes is just and in favor of the Plaintiffs.

COUNT VIII - § 1985 (3) DEPRIVATION

Violation of Plaintiffs' Federal and Legal Rights

201. Plaintiffs, Marvin Faulkner and Samuel C. Umunna, incorporates and restates each of the above paragraphs [in reference each allegation in all of the above sections, paragraphs, and sub-paragraphs] as if fully set forth herein this count.

202. ANNA M. LOFTUS; WILLIAM FARROW; PIERCE & ASSOCIATES; FEDERAL DEPOSIT INSURANCE CORPORATION; URBAN PARTNERSHIP BANK; SHOREBANK; JENNER & BLOCK LLP; CHUHAK & TECSON, P.C.;

MICHAEL A. EURICH; VILLA CAPITAL PROPERTIES; GEORGE F. SCULLY JR.; ELIZABETH LYONS; DARRLY B. SIMKO; CITY OF CHICAGO; ALFRED M. SWANSON JR.; LASALLE BANK NATIONAL, as trustee for Certificate holders of Bear Stearns Asset Back Securities I, LLC, Asset-Backed; Certificates, Series 2007-HE6; MORTGAGE ELECTRONIC REGISTRATION SYSTEMS; ENCORE CREDIT; EMC MORTGAGE CORPORATION; BEAR STEARNS ASSET BACKED SECURITIES I LLC; NATIONSTAR MORTGAGE, LLC; CITIMORTGAGE, INC.; BEAR STEARNS ASSET BACKED SECURITIES I TRUST 2007-HE6; FEDERAL NATIONAL MORTGAGE ASSOCIATION; FIRST FRANKLEN MORTGAGE; US BANK NATIONAL ASSOCIATES; MICHAEL N. VARAK; BRYAN GOMEZ; KOVITZ, SHIFRIN & NESBIT LAW OFFICE; MEREDITH FREEMAN; EDWARD J. LESNIAK; ALEXANDER D. MARKS; PAMELA MCLEAN MEYERSON; BURKE, WARREN, MACKAY & SERRITELLA, P.C.; CHRISTINA PLACE II CONDOMINIUM ASSOCIATION; RAYMOND W. MITCHELL; IRWIN J. SOLGANICK; ALEXANDER P. WHITE; TIMOTHY L. ROWELL; STARR, BEJGIERT, ZINK & ROWELL; CODILIS & ASSOCIATES; COOK COUNTY SHERIFF'S POLICE DEPARTMENT; SONIA PASQUESI; JOHN AVGERINOS; PAUL AVGERINOS; SAMANTHA L. BABCOCK; ERIK HUBBARD; HAUSELMAN, RAPPIN & OLSWANG, LTD *and* RODERICK PIERCE **have** acted under the color of law when LOFTUS; FARROW; PIERCE; FDIC; UPB; SHOREBANK; C & T; EURICH; VCP; SCULLY; LYONS; SIMKO; CHICAGO; SWANSON JR.; LASALLE BANK; MERS; ENCORE; EMC; BEAR STEARNS; NATIONSTAR; CITIMORTGAGE; BEAR STEARNS 2007-HE6; FNM; FIRST

FRANKLEN; US BANK; VARAK; GOMEZ; KS&N; FREEMAN; LESNIAK;
MARKS; MEYERSON; BWMACKAY& S; CHRISTINA PLACE II; MITCHELL;
SOLGANICK; WHITE; ROWELL; SBZ&R; CODILIS; COOK COUNTY SHERIFF'S;
PASQUESI; J. AVGERINOS; P. AVGERINOS; BABCOCK; HUBBARD; HR&O *and*
PIERCE deprived Plaintiff of **their** Constitutional Rights, as well as, violating
the 2nd, 4th, 5th and 14th Amendments Rights federal rights, property interests and
otherwise discriminated against Marvin Faulkner and Samuel C. Umunna, based upon the
illicit acts by the LOFTUS; FARROW; PIERCE; FDIC; UPB; SHOREBANK; C & T;
EURICH; VCP; SCULLY; LYONS; SIMKO; CHICAGO; SWANSON JR.; LASALLE
BANK; MERS; ENCORE; EMC; BEAR STEARNS; NATIONSTAR;
CITIMORTGAGE; BEAR STEARNS 2007-HE6; FNM; FIRST FRANKLEN; US
BANK; VARAK; GOMEZ; KS&N; FREEMAN; LESNIAK; MARKS; MEYERSON;
BWMACKAY& S; CHRISTINA PLACE II; MITCHELL; SOLGANICK; WHITE;
ROWELL; SBZ&R; CODILIS; COOK COUNTY SHERIFF'S; PASQUESI; J.
AVGERINOS; P. AVGERINOS; BABCOCK; HUBBARD; HR&O *and* PIERCE.

203. As a direct and proximate result of LOFTUS; FARROW; PIERCE; FDIC; UPB;
SHOREBANK; C & T; EURICH; VCP; SCULLY; LYONS; SIMKO; CHICAGO;
SWANSON JR.; LASALLE BANK; MERS; ENCORE; EMC; BEAR STEARNS;
NATIONSTAR; CITIMORTGAGE; BEAR STEARNS 2007-HE6; FNM; FIRST
FRANKLEN; US BANK; VARAK; GOMEZ; KS&N; FREEMAN; LESNIAK;
MARKS; MEYERSON; BWMACKAY& S; CHRISTINA PLACE II; MITCHELL;
SOLGANICK; WHITE; ROWELL; SBZ&R; CODILIS; COOK COUNTY SHERIFF'S;
PASQUESI; J. AVGERINOS; P. AVGERINOS; BABCOCK; HUBBARD; HR&O *and*

PIERCE *Violation of §1985 (3) Deprivation*, Marvin Faulkner and Samuel C. Umunna, **have** sustained injuries and/or damages.

- a. The Plaintiff(s) is targeted and harmed physically, by illness and emotionally distress of the illicit plot by the Defendant(s).
- b. The Plaintiff(s) have suffered extreme financial damages as aforementioned in this "*Second Amended Verified Complaint*".
- c. The Plaintiff believe that their telephones and computers are being tap by the Defendant(s).

204. The circuit court judges knew that he lost all immunity as a Judges when he participated in criminal acts, aiding, assisting or conniving with others who perform a criminal act in their administrative/ministerial duties.

205. That continually from the period of 2008 and 2017 of this "*Second Amended Verified Complaint*" Defendant(s), as a result that the Plaintiffs exercised their constitutional, State and local rights to defend themselves and their properties against corruption against the defendants, as aforementioned.

206. The defendant(s), herein, both directly and indirectly, individually and through its agents, servants and employees, herein in this Count XI §1986 Conspiracy well knowing its duty in this regard, under the color of law, carelessly and prior thereto, caused and permitted said harm to become and remain against the plaintiffs.

207. That during the period of 2008 thru 2017 of this "*Second Amended Verified Complaint*" Plaintiff(s) filed complaints with the FBI, the Judicial Board, to the Circuit of Cook County, the United States District Court for the Northern District of Illinois, Eastern Division for protection against the Plaintiffs from the defendants on many

occasions, Plaintiffs had warned the Defendant(s) of their harm to the Plaintiffs.

208. That the Defendants by its servants, agents and employees were then and there guilty of one or more of the following harms, negligent acts and/or omissions:

a). Defendant(s) conspired to intimidate the Plaintiffs, as set forth, herein, to directly or indirectly take away Plaintiffs' protection under the laws by the Defendant(s) threat on the Plaintiffs using *color of law* for Defendant(s) ill-gotten gain.

209. That by reason of the set forth in the "*Second Amended Verified Complaint*" of paragraphs, above as a result of the aforesaid intention and directly or indirectly, of the said Defendants, as a result that, Plaintiffs, Marvin Faulkner and/or Samuel C. Umunna, was caused to suffer divers temporary and permanent fear and harm to their way of life, bodies, financial depletion, their reputation, their ability of life, liberty and the pursuant of happiness. Plaintiffs have been and will be prevented from attending to their usual affairs and duties and has lost and will continue to lose great gains they would otherwise have made and acquired.

210. As a direct and proximate result of the LOFTUS; FARROW; PIERCE; FDIC; UPB; SHOREBANK; C & T; EURICH; VCP; SCULLY; LYONS; SIMKO; CHICAGO; SWANSON JR.; LASALLE BANK; MERS; ENCORE; EMC; BEAR STEARNS; NATIONSTAR; CITIMORTGAGE; BEAR STEARNS 2007-HE6; FNM; FIRST FRANKLEN; US BANK; VARAK; GOMEZ; KS&N; FREEMAN; LESNIAK; MARKS; MEYERSON; BWMACKAY& S; CHRISTINA PLACE II; MITCHELL; SOLGANICK; WHITE; ROWELL; SBZ&R; CODILIS; COOK COUNTY SHERIFF'S; PASQUESI; J. AVGERINOS; P. AVGERINOS; BABCOCK; HUBBARD; HR&O and PIERCE violations of Marvin Faulkner and Samuel C. Umunna, constitutional rights,

Marvin Faulkner and Samuel C. Umunna, **have** suffered severe and substantial damages. These damages include loss of income, loss of benefits, loss of investments, diminished earnings capacity, loss of career and business opportunities, litigation expenses including attorney fees, loss of reputation, humiliation, intimidation, embarrassment, inconvenience, mental and emotional anguish and distress and other compensatory damages, in an amount to be determined by a jury and the Court.

WHEREFORE, Plaintiffs are requesting against the Defendant(s) and in Favor of the Plaintiffs in the amount of Four Million Nine Hundred Five Thousand Seven Hundred Seventy-One Dollars and Eight-Seven Cents (**\$4,905,771.87**) in actual damages. (**TO BE DETERMINED**) in compensatory damages. Fourteen Million Seven Hundred Seventeen Thousand Three Hundred Fifteen Dollars and Sixty-One cents (**\$14,717,315.61**) in treble damages and Forty Million Dollars (**\$40,000,000.00**) in punitive damages; releasing Plaintiffs, Marvin Faulkner and Samuel C. Umunna from harm by the defendant(s); attorney's fees and costs (*if applicable*) and any other just remedy that this Honorable Court believes is just and in favor of the Plaintiffs.

COUNT IX – § 1986 CONSPIRACY
Violation of Plaintiffs' Federal and Legal Rights

211. Plaintiffs, Marvin Faulkner and Samuel C. Umunna, incorporates and restates each of the above paragraphs [in reference each allegation in all of the above sections, paragraphs, and sub-paragraphs] as if fully set forth herein this count.

212. ANNA M. LOFTUS; WILLIAM FARROW; PIERCE & ASSOCIATES; FEDERAL DEPOSIT INSURANCE CORPORATION; URBAN PARTNERSHIP BANK; SHOREBANK; JENNER & BLOCK LLP; CHUHAK & TECSON, P.C.;

MICHAEL A. EURICH; VILLA CAPITAL PROPERTIES; GEORGE F. SCULLY JR.; ELIZABETH LYONS; DARRLY B. SIMKO; CITY OF CHICAGO; ALFRED M. SWANSON JR.; LASALLE BANK NATIONAL, as trustee for Certificate holders of Bear Stearns Asset Back Securities I, LLC, Asset-Backed; Certificates, Series 2007-HE6; MORTGAGE ELECTRONIC REGISTRATION SYSTEMS; ENCORE CREDIT; EMC MORTGAGE CORPORATION; BEAR STEARNS ASSET BACKED SECURITIES I LLC; NATIONSTAR MORTGAGE, LLC; CITIMORTGAGE, INC.; BEAR STEARNS ASSET BACKED SECURITIES I TRUST 2007-HE6; FEDERAL NATIONAL MORTGAGE ASSOCIATION; FIRST FRANKLEN MORTGAGE; US BANK NATIONAL ASSOCIATES; MICHAEL FRANCIS OTTO; MICHAEL N. VARAK; BRYAN GOMEZ; KOVITZ, SHIFRIN & NESBIT LAW OFFICE; MEREDITH FREEMAN; EDWARD J. LESNIAK; ALEXANDER D. MARKS; PAMELA MCLEAN MEYERSON; BURKE, WARREN, MACKAY & SERRITELLA, P.C.; CHRISTINA PLACE II CONDOMINIUM ASSOCIATION; RAYMOND W. MITCHELL; IRWIN J. SOLGANICK; ALEXANDER P. WHITE; TIMOTHY L. ROWELL; STARR, BEJGIERT, ZINK & ROWELL; CODILIS & ASSOCIATES; COOK COUNTY SHERIFF'S POLICE DEPARTMENT; SONIA PASQUESI; JOHN AVGERINOS; PAUL AVGERINOS; SAMANTHA L. BABCOCK; ERIK HUBBARD; HAUSELMAN, RAPPIN & OLSWANG, LTD *and* RODERICK PIERCE] [has/have] acted under the color of law when LOFTUS; FARROW; PIERCE; FDIC; UPB; SHOREBANK; C & T; EURICH; VCP; SCULLY; LYONS; SIMKO; CHICAGO; SWANSON JR.; LASALLE BANK; MERS; ENCORE; EMC; BEAR STEARNS; NATIONSTAR; CITIMORTGAGE; BEAR STEARNS 2007-HE6; FNM; FIRST

FRANKLEN; US BANK; VARAK; GOMEZ; KS&N; FREEMAN; LESNIAK; MARKS; MEYERSON; BWMACKAY& S; CHRISTINA PLACE II; MITCHELL; SOLGANICK; WHITE; ROWELL; SBZ&R; CODILIS; COOK COUNTY SHERIFF'S; PASQUESI; J. AVGERINOS; P. AVGERINOS; BABCOCK; HUBBARD; HR&O *and* PIERCE] deprived Plaintiffs of **their** Constitutional Rights, as well as, violating the 2nd, 4th, 5th and 14th Amendments Rights federal rights, property interests and otherwise discriminated against Marvin Faulkner and Samuel C. Umunna, based upon the illicit acts by the LOFTUS; FARROW; PIERCE; FDIC; UPB; SHOREBANK; C & T; EURICH; VCP; SCULLY; LYONS; SIMKO; CHICAGO; SWANSON JR.; LASALLE BANK; MERS; ENCORE; EMC; BEAR STEARNS; NATIONSTAR; CITIMORTGAGE; BEAR STEARNS 2007-HE6; FNM; FIRST FRANKLEN; US BANK; VARAK; GOMEZ; KS&N; FREEMAN; LESNIAK; MARKS; MEYERSON; BWMACKAY& S; CHRISTINA PLACE II; MITCHELL; SOLGANICK; WHITE; ROWELL; SBZ&R; CODILIS; COOK COUNTY SHERIFF'S; PASQUESI; J. AVGERINOS; P. AVGERINOS; BABCOCK; HUBBARD; HR&O *and* PIERCE.

213. As a direct and proximate result of LOFTUS; FARROW; PIERCE; FDIC; UPB; SHOREBANK; C & T; EURICH; VCP; SCULLY; LYONS; SIMKO; CHICAGO; SWANSON JR.; LASALLE BANK; MERS; ENCORE; EMC; BEAR STEARNS; NATIONSTAR; CITIMORTGAGE; BEAR STEARNS 2007-HE6; FNM; FIRST FRANKLEN; US BANK; VARAK; GOMEZ; KS&N; FREEMAN; LESNIAK; MARKS; MEYERSON; BWMACKAY& S; CHRISTINA PLACE II; MITCHELL; SOLGANICK; WHITE; ROWELL; SBZ&R; CODILIS; COOK COUNTY SHERIFF'S; PASQUESI; J. AVGERINOS; P. AVGERINOS; BABCOCK; HUBBARD; HR&O *and*

PIERCE *Violation of §1986 Conspiracy*, Marvin Faulkner and Samuel C. Umunna, **have** sustained injuries and/or damages.

a. The Plaintiff(s) is targeted and harmed physically, by illness and emotionally distress of the illicit plot by the Defendant(s).

b. The Plaintiff(s) have suffered extreme financial damages as aforementioned in this "*Second Amended Verified Complaint*".

c. The Plaintiff believe that their telephones and computers are being tap by the Defendant(s).

214. That continually from the period of 2008 and 2017 of this "*Second Amended Verified Complaint*" Defendants, as a result that, the Plaintiffs exercised their constitutional, State and local rights to defend themselves and their properties against corruption against the defendants, as aforementioned.

215. The Defendant(s), herein, both directly and indirectly, individually and through its agents, servants and employees, herein in this Count XI §1986 Conspiracy well knowing its duty in this regard, under the color of law, carelessly and prior thereto, caused and permitted said harm to become and remain against the Plaintiffs.

216. That, during the period of 2008 thru 2017 of this "*Second Amended Verified Complaint*" plaintiff filed complaints with the FBI, the Judicial Board, to the Circuit of Cook County, the United States District Court for the Northern District of Illinois, Eastern Division for protection against the Plaintiffs from the Defendant(s) on many occasion, Plaintiffs had warned the Defendant(s) of their harm, to the Plaintiffs.

217. That the Defendant(s) by its servants, agents and employees was then and there guilty of one or more of the following harms, negligent acts and/or omissions:

a). Defendant(s) in their capacity being learned in the laws, conspired to destroy the Plaintiffs and take Plaintiffs way of life; breaching of their fiduciary duties inherent in their positions and the Defendant(s) refusal of their reasonable aid for the Plaintiffs to prevent the extreme harm from and by the Defendant(s).

218. That by reason of the set forth in the "*Second Amended Verified Complaint*" of paragraphs, above as a result, of the aforesaid intention and directly or indirectly, of the said Defendants, as a result that, Plaintiffs, Marvin Faulkner and/or Samuel C. Umunna, was caused to suffer divers temporary and permanent fear and harm to their way of life, bodies, financial depletion, their reputation, their ability of life, liberty and the pursuant of happiness. Plaintiff has been and will be prevented from attending to their usual affairs and duties and has lost and will continue to lose great gains they would otherwise have acquired.

219. As a direct and proximate result of the LOFTUS; FARROW; PIERCE; FDIC; UPB; SHOREBANK; C & T; EURICH; VCP; SCULLY; LYONS; SIMKO; CHICAGO; SWANSON JR.; LASALLE BANK; MERS; ENCORE; EMC; BEAR STEARNS; NATIONSTAR; CITIMORTGAGE; BEAR STEARNS 2007-HE6; FNM; FIRST FRANKLEN; US BANK; VARAK; GOMEZ; KS&N; FREEMAN; LESNIAK; MARKS; MEYERSON; BWMACKAY& S; CHRISTINA PLACE II; MITCHELL; SOLGANICK; WHITE; ROWELL; SBZ&R; CODILIS; COOK COUNTY SHERIFF'S; PASQUESI; J. AVGERINOS; P. AVGERINOS; BABCOCK; HUBBARD; HR&O and PIERCE violations of Marvin Faulkner and Samuel C. Umunna, Constitutional Rights, as well as, violating the 2nd, 4th, 5th and 14th Amendments Rights of Marvin Faulkner and Samuel C. Umunna, **have** suffered severe and substantial damages. These damages

include loss of income, loss of benefits, loss of investments, diminished earnings capacity, loss of career and business opportunities, litigation expenses including attorney fees, loss of reputation, humiliation, intimidation, embarrassment, inconvenience, mental and emotional anguish and distress and other compensatory damages, in an amount to be determined by a jury and the Court.

WHEREFORE, Plaintiffs are requesting against the Defendant(s) and in Favor of the Plaintiffs in the amount of Four Million Nine Hundred Five Thousand Seven Hundred Seventy-One Dollars and Eight-Seven Cents (**\$4,905,771.87**) in actual damages. (**TO BE DETERMINED**) in compensatory damages. Fourteen Million Seven Hundred Seventeen Thousand Three Hundred Fifteen Dollars and Sixty-One cents (**\$14,717,315.61**) in treble damages and Forty Million Dollars (**\$40,000,000.00**) in punitive damages; releasing Plaintiffs, Marvin Faulkner and Samuel C. Umunna from harm by the defendant(s); attorney's fees and costs (*if applicable*) and any other just remedy that this Honorable Court believes is just and in favor of the Plaintiffs.

COUNT X - PIERCED CORPORATE VEIL

PIERCED CORPORATE VEIL

220. Plaintiffs, Marvin Faulkner and Samuel C. Umunna, incorporates and restates each of the above paragraphs [in reference each allegation in all of the above sections, paragraphs, and sub-paragraphs] as if fully set forth herein this count.

221. PIERCE & ASSOCIATES; FEDERAL DEPOSIT INSURANCE CORPORATION; URBAN PARTNERSHIP BANK; SHOREBANK; CHUHAK & TECSON, P.C.; VILLA CAPITAL PROPERTIES; CITY OF CHICAGO; LASALLE BANK NATIONAL, as trustee for Certificate holders of Bear Stearns Asset Back

Securities I, LLC, Asset-Backed; Certificates, Series 2007-HE6; MORTGAGE ELECTRONIC REGISTRATION SYSTEMS; ENCORE CREDIT; EMC MORTGAGE CORPORATION; BEAR STEARNS ASSET BACKED SECURITIES I LLC; NATIONSTAR MORTGAGE, LLC; CITIMORTGAGE, INC.; BEAR STEARNS ASSET BACKED SECURITIES I TRUST 2007-HE6; FEDERAL NATIONAL MORTGAGE ASSOCIATION; FIRST FRANKLEN MORTGAGE; US BANK NATIONAL ASSOCIATES; SHIFRIN & NESBIT LAW OFFICE; BURKE, WARREN, MACKAY & SERRITELLA, P.C.; CHRISTINA PLACE II CONDOMINIUM ASSOCIATION; STARR, BEJGIERT, ZINK & ROWELL; CODILIS & ASSOCIATES; COOK COUNTY SHERIFF'S POLICE DEPARTMENT and HAUSELMAN, RAPPIN & OLSWANG, LTD **have** acted under the color of law when PIERCE; FDIC; UPB; SHOREBANK; C & T; VCP; CHICAGO; SWANSON JR.; LASALLE BANK; MERS; ENCORE; EMC; BEAR STEARNS; NATIONSTAR; CITIMORTGAGE; BEAR STEARNS 2007-HE6; FNM; FIRST FRANKLEN; US BANK; KS&N; BWM&S; CHRISTINA PLACE II; SBZ&R; CODILIS; COOK COUNTY SHERIFF'S and HR&O deprived Plaintiff of **their** Constitutional Rights, as well as, violating the 2nd, 4th, 5th and 14th Amendments Rights federal rights, property interests and otherwise discriminated against Marvin Faulkner and Samuel C. Umunna, based upon the illicit acts by the PIERCE; FDIC; UPB; SHOREBANK; C&T; VCP; CHICAGO; LASALLE BANK; MERS; ENCORE; EMC; BEAR STEARNS; NATIONSTAR; CITIMORTGAGE; BEAR STEARNS 2007-HE6; FNM; FIRST FRANKLEN; US BANK; KS&N; BWM&S; CHRISTINA PLACE II; SBZ&R; CODILIS; COOK COUNTY SHERIFF'S and HR&O.

222. As a direct and proximate result of PIERCE; FDIC; UPB; SHOREBANK; C & T; VCP; CHICAGO; LASALLE BANK; MERS; ENCORE; EMC; BEAR STEARNS; NATIONSTAR; CITIMORTGAGE; BEAR STEARNS 2007-HE6; FNM; FIRST FRANKLEN; US BANK; KS&N; BWM&S; CHRISTINA PLACE II; SBZ&R; CODILIS; COOK COUNTY SHERIFF'S and HR&O *Violation of Pierced Corporate Veil*, Marvin Faulkner and Samuel C. Umunna, **have** sustained injuries and/or damages.

(a). In this cause-of-action, the Plaintiffs seek that the "*corporate veil(s)*" are pierced, in this action, so that the corporations cannot be regarded as a legal entity separate from its shareholders.

(b). Plaintiffs seek that the court hold the individuals (whether officer, director, shareholder, parent corporation, and/or subsidiary), personally liable.

(c). Plaintiffs seek that the court treat the individual defendants as within the alter ego doctrine and find each of the defendants personally liable for the claims in this action and damages as addressed herein.

(d). The defendant corporations were so controlled as the *alter ego* or mere instrumentality of its owners were established for the purposed of committing fraud, deception, bad faith, abuse of the corporate forum, to defraud the government, breach the public trust, unjust enrichment, abuse of power, visiting injustice upon Plaintiffs, but not limited thereto.

(e). This case involves many federal questions and some of the claims deal with racketeering, conspiracy, corruption, fraud, but not limited thereto.

(f). The individual defendants should be made personally liable for damages caused by a corporation's of a federal statute and the veils should be pierced.

(g). On information and belief, there are causes-of-action in this case arising under federal statutes, issues of public policy, and possibly federal and/or state public funds are involved, but not limited thereto.

(h). On information and belief, there was a high interdependency of business operations in the form of formal and informal consolidation of financial, strategic, legal, and human resources operations, but not limited thereto.

(i). It is inequitable for the defendants to be allowed to invoke the corporate shield and avoid financial obligations.

(j). The corporate veil should be pierced to treat the defendant corporations' acts as if done by those actually controlling the corporations, in the interests of public convenience, fairness, equity, but not limited thereto.

(k). On information and belief, there is a unity of interest, ownership, and benefit separate personalities of the corporation and its corporate shareholders no longer exist.

(l). the acts of the defendant corporations should not be treated as those of the corporation alone.

(m). If the defendant corporations were to be treated as those of the corporation alone, then an inequitable result will follow and this equitable remedy *doctrine* of piercing the corporate veil should be granted to achieve an equitable result.

(n). On information and belief, the parent, subsidiary, and/or affiliate corporations, have the following in common, but not limited thereto: **(1).** benefactors; **(2).** contracts; **(3).** stock ownership; **(4).** directors or officers; **(5).** business departments; **(6).** consolidated financial statements and/or tax returns; **(7).** parent finances the subsidiaries and/or affiliates; **(8).** parent caused the incorporation of the subsidiaries and/or affiliates;

(9). operations of grossly inadequate capital (undercapitalization); (10). parent and/or affiliates pay the salaries and other expenses of the subsidiaries and/or affiliates; (11). the subsidiary receives no business except that given to it by the parent and/or the affiliate corporations; (12). the parent uses the subsidiary's property as its own; (13). the daily operation of the corporations are not kept separate; and (14). the subsidiary does not observe the basic corporate formalities (such as keeping separate books and records as well as holding shareholder and board meetings, but not limited thereto).

(o). On information and belief, there are interlocking directors and officer positions between the parent, subsidiaries, and/or affiliate corporations; intercompany agreements, contracts, ownerships, benefactors, but not limited thereto.

(p). On information and belief, there is substantial control by the parent entity defendant corporations over the finances, policies and practices of the subsidiary and/or affiliate corporations to such a degree that the parent entity operates the controlled corporation merely as its business conduit or agent.

(q). On information and belief, the alter ego analysis/test is the same under state or federal law; there is abuse of the corporate form and this court should employ the tool of equity known as *veil-piercing*.

(r). On information and belief, the court may disregard the corporate entity and hold a corporation's shareholders personally liable for the acts and debts of the corporation's (whether parent, subsidiaries, affiliated companies, but not limited thereto).

WHEREFORE, Plaintiffs are requesting against the Defendant(s) and in Favor of the Plaintiffs in the amount of Four Million Nine Hundred Five Thousand Seven Hundred Seventy-One Dollars and Eight-Seven Cents (**\$4,905,771.87**) in actual

damages. (TO BE DETERMINED) in compensatory damages. Fourteen Million Seven Hundred Seventeen Thousand Three Hundred Fifteen Dollars and Sixty-One cents (\$14,717,315.61) in treble damages and Forty Million Dollars (\$40,000,000.00) in punitive damages; releasing Plaintiffs, Marvin Faulkner and Samuel C. Umunna from harm by the defendant(s); attorney's fees and costs (*if applicable*) and any other just remedy that this Honorable Court believes is just and in favor of the Plaintiffs.

COUNT XI - 42 U. S. C. § 1983

Violation of Plaintiffs' Federal and Legal Rights

223. Plaintiffs, Marvin Faulkner and Samuel C. Umunna, incorporates and restates each of the above paragraphs [in reference each allegation in all of the above sections, paragraphs, and sub-paragraphs] as if fully set forth herein this count.

224. WILLIAM FARROW; MICHAEL A. EURICH; ELIZABETH LYONS; MICHAEL N. VARAK; BRYAN GOMEZ; MEREDITH FREEMAN; EDWARD J. LESNIAK; ALEXANDER D. MARKS; TIMOTHY L. ROWELL; SONIA PASQUESI; JOHN AVGERINOS; PAUL AVGERINOS; SAMANTHA L. BABCOCK; ERIK HUBBARD; and RODERICK PIERCE **have** acted under the color of law when FARROW; EURICH; LYONS; VARAK; GOMEZ; FREEMAN; LESNIAK; MARKS; ROWELL; PASQUESI; J. AVGERINOS; P. AVGERINOS; BABCOCK and PIERCE deprived Marvin Faulkner and Samuel C. Umunna, of **their** Constitutional Rights, as well as, violating the 2nd, 4th, 5th and 14th Amendments Rights federal rights, property interests and otherwise discriminated against Marvin Faulkner and Samuel C. Umunna, based upon the illicit acts by the FARROW; EURICH; LYONS; VARAK; GOMEZ; FREEMAN; LESNIAK; MARKS; ROWELL; PASQUESI; J. AVGERINOS; P. AVGERINOS; BABCOCK; HUBBARD and PIERCE.

225. As a direct and proximate result of FARROW; EURICH; LYONS; VARAK; GOMEZ; FREEMAN; LESNIAK; MARKS; ROWELL; PASQUESI; J. AVGERINOS; P. AVGERINOS; BABCOCK; HUBBARD and PIERCE *Violation of 42 U.S.C. §1983*, Marvin Faulkner and Samuel C. Umunna, **have** sustained injuries and/or damages.

a. The Plaintiff(s) is targeted and harmed physically, by illness and emotionally distress of the illicit plot by the Defendant(s).

b. The Plaintiff(s) have suffered extreme financial damages as aforementioned in this "*Second Amended Verified Complaint*".

c. The Plaintiffs believe that their telephones and computers are being tap by the Defendant(s). Judge was hired by the State as an officer of the Court to protect the public from injustice and did not.

226. That continually from the period of 2008 and 2017 of this "*Second Amended Verified Complaint*" Defendants' plot to destroy the Plaintiffs; because the Plaintiffs preformed and exercised their constitutional, State and local rights to defend themselves and their properties against corruption against the Defendants, as aforementioned.

227. The Defendant(s), herein, both directly and indirectly, individually and through its agents, servants and employees, herein in this Count XI §1986 Conspiracy well knowing its duty in this regard, under the color of law, carelessly and prior thereto, caused and permitted said harm to become and remain against the Plaintiffs.

228. That during the period of 2008 thru 2017 of this "*Second Amended Verified Complaint*" Plaintiff(s) filed with the FBI, the Judicial Board, to the Circuit of Cook County, the United States District Court for the Northern District of Illinois, Eastern Division for protection against the Defendants on many occasion, Plaintiffs had made

aware to the Defendant(s) of the harm and fear the Plaintiffs have of the Defendant(s).

229. That the Defendants by its servants, agents and employees were then and there guilty of one or more of the following harms, negligent acts and/or omissions:

a). Defendant(s) derivation of Plaintiffs their Constitutional Rights, Privileges that are/is secured by laws in a continuous manner plot/plotted against the Plaintiffs to fulfill their conspiracy to defraud the Plaintiffs and the Plaintiffs way of life.

b). Defendant(s) in their reckless and direct acts caused Plaintiffs irreversible harm, as set forth in this "*Second Amended Verified Complaint*", (*But, not limited to*).

230. That by reason of the set forth in the "*Second Amended Verified Complaint*" of paragraphs above as a result of the aforesaid intention and directly or indirectly, of the said Defendant(s), as a result that, Plaintiffs, Marvin Faulkner and/or Samuel C. Umunna, was caused to suffer divers temporary and permanent fear and harm to their way of life, bodies, financial depletion, their reputation, their ability of life, liberty and the pursuant of happiness. Plaintiffs have been and will be prevented from attending to their usual affairs and duties and has lost and will continue to lose great gains they would otherwise have acquired.

231. As a direct and proximate result of the FARROW; EURICH; LYONS; VARAK; GOMEZ; FREEMAN; LESNIAK; MARKS; ROWELL; PASQUESI; J. AVGERINOS; P. AVGERINOS; BABCOCK; HUBBARD and PIERCE violations of Marvin Faulkner and Samuel C. Umunna, constitutional rights, Marvin Faulkner and Samuel C. Umunna, **have** suffered severe and substantial damages. These damages include loss of income, loss of benefits, loss of investments, diminished earnings capacity, loss of career and business opportunities, litigation expenses including attorney fees, loss of reputation,

humiliation, intimidation, embarrassment, inconvenience, mental and emotional anguish and distress and other compensatory damages, in an amount to be determined by a jury and the Court.

WHEREFORE, Plaintiffs are requesting against the Defendant(s) and in Favor of the Plaintiffs in the amount of Four Million Nine Hundred Five Thousand Seven Hundred Seventy-One Dollars and Eight-Seven Cents (**\$4,905,771.87**) in actual damages. (**TO BE DETERMINED**) in compensatory damages. Fourteen Million Seven Hundred Seventeen Thousand Three Hundred Fifteen Dollars and Sixty-One cents (**\$14,717,315.61**) in treble damages and Forty Million Dollars (**\$40,000,000.00**) in punitive damages; releasing Plaintiffs, Marvin Faulkner and Samuel C. Umunna from harm by the defendant(s); attorney's fees and costs (*if applicable*) and any other just remedy that this Honorable Court believes is just and in favor of the Plaintiffs.

IX. DISCOVERY RULE AND FRAUDULENT CONCEALMENT

232. Plaintiffs hereby affirmatively plead the discovery rule and would show that Plaintiffs' claims are not barred by limitations and accrued only when Plaintiffs discovered or, in the exercise of reasonable diligence, should have discovered the facts giving rise to their causes of action.

a). Plaintiffs hereby affirmatively plead fraudulent concealment and would show that Plaintiffs' claims are not barred by limitations and accrued only when Plaintiffs discovered the Defendant(s)' fraudulent concealment of the facts giving rise to Plaintiff(s)' causes of actions.

X. JURY DEMAND

233. Pursuant to Federal Rule of Civil Procedure 38(b), Plaintiff(s) hereby demands a trial by jury on all issues tribal/trial by jury.

a). Plaintiffs request this case be decided by a jury, and the appropriate jury fee has been paid by the Plaintiffs.

XI. REQUESTED RELIEF

234. Plaintiffs request Defendants to be cited to appear and answer and that they have judgment for their damages, treble damages, punitive damages, costs, interest, attorney's fees, relief under 18 USC §1964(a) and any other relief to which they may show themselves entitled.

a). Due to additional information has been searched and not yet received of documents, exhibits and facts, not yet plead, herein. Plaintiff(s) requests additional time to supplement and/or amended this "*Second Amended Verified Complaint*". Additional title violations and additional common law claims have not yet been inclusive of this "*Second Amended Verified Complaint*". And, if discovery is not granted for any reason and/or request for dismissal of this "*Second Amended Verified Complaint*" is requested by any party or entity of this matter and upon Plaintiffs' request; Plaintiff(s) calls for dismissal of the "*Second Amended Verified Complaint*" without prejudice by this Honorable Court.

XII. CLAIM FOR RELIEF

235. *WHEREFORE*, Plaintiffs, on behalf of themselves respectfully request that the Court;

A. Enter judgments against each of the Defendant and in favor of the Plaintiffs and each of the respective violations of RICO and/or common law issues;

B. Award the Plaintiffs actual and compensatory damages, trebled, in an amount to be determined at trial;

C. Award the Plaintiffs restitution or disgorgement of ill-gotten gains, as appropriate;

D. Award the Plaintiffs exemplary and/or punitive damages predicated on their claim for fraud, as allowed by law;

E. Award the Plaintiffs their costs of suit, including reasonable attorneys' fee, as provided by law;

F. Award the Plaintiffs prejudgment and post-judgment interest, as allowed by law

G. For appropriate declaratory relief regarding the unlawful and unconstitutional acts and practices of the [Defendant/Defendants].

H. For appropriate equitable relief against all Defendants as allowed by the Civil Rights Act of 1871, 42 U.S.C. §1983, including the enjoining and permanent restraining of these violations, and direction to the Defendants to take such affirmative action as is necessary to ensure that the effects of the unconstitutional and unlawful practices are eliminated and do not continue to affect the plaintiffs' or others'.

I. Plaintiffs requests that this Honorable Court rule in favor of Plaintiffs, Marvin Faulkner (**at 75% shares** pre property/instrument/investments between Faulkner and Umunna) and Samuel C. Umunna (**at 25% shares** pre property/instrument/investments between Faulkner and Umunna), and rule against each Defendant(s) for actual damages:

J. Award such further and additional relief as the Court deems just and proper.

XIII. PARTY AND/OR NON-PARTY WITNESSES IN THEIR PERSONAL AND/OR OFFICIAL CAPACITY:

236. **Dorothy Brown**; (*Also, Brown*) is a citizen of the United States, and is a resident

of the State of Illinois.

- A. **Abbey Fishman Romanek**: (*Also, Romanek*) is a citizen of United States, and is a resident of the State of Illinois.
- B. **(Last name) Carter**: (*Also, Carter*) is a citizen of the United States, and is a resident of the State of Illinois.
- C. **Daniel Gronowski**: (*Also, Gronowski*) sheriff of loftus
- D. **Tommie Bosley**: (*Also, Bosley*) is a citizen of United States, and is a resident of the State of Illinois.
- E. **Henry Ribich**: (*Also, Ribich*) is a citizen of the United States, and is a resident of the State of Illinois.
- H. **Robert More**: (*Also, More*) is a citizen of the United States, and is a resident of the State of Illinois.
- K. **Michael A. Eurich**: (*Also, Ribich*) is a citizen of the United States, and is a resident of the State of Illinois.
- L. **Villa Capital Properties**: (*Also, VCP*) is a corporation of the United States, and is during business in the State of Illinois.
- M. **Elizabeth Lyons**: (*Also, Ribich*), is a citizen of the United States, and is a resident of the State of Illinois.
- P. **Timothy L. Rowell**: (*Also, Rowell*) is a citizen of the United States, and is a resident of the State of Illinois.
- Q. **John Avgerinos**: (*Also, Avgerinos*) is a citizen of the United States, and is a resident of the State of Indiana.
- R. **Paul Avgerinos**: (*Also, Avgerinos*) is a citizen of the United States, and is a

resident of the State of Indiana.

S. **Samantha L. Babcock**: (*Also, Babcock*) is a citizen of the United States, and is a resident of the State of Illinois.

T. **Steven E. Anderson**: (*Also, Anderson*) is a citizen of the United States, and is a resident of the State of Illinois.

U. **Erik Hubbard**: (*Also, Hubbard*) is a citizen of the United States, and is a resident of the State of Illinois.

V. **Roderick Pierce**: (*Also, Pierce*) is a citizen of the United States, and is a resident of the State of Illinois.

IVX. NOTICED ENTITIES PRUSUANT FEDERAL, STATE AND LOCAL LAWS

237. Below is the list of noticed entities pursuant to Federal Law among others:

- A. U.S. JUSTICE DEPARTMENT (DOJ)
- B. UNITED STATES MARSHALL
- C. FEDERAL BUREAU OF INVESTIGATION (F.B.I.)
- D. ASSISTANT ATTORNEYS GENERAL
- E. AMERICAN CIVIL LIBERTIES UNION (ACLU)

XV. CLASS-ACTION (WITH EXCEPTION OF THE RICO COUNT(S))

238. **CLASS MEMBERS (whereas applicable)**

(a). **CLASS MEMBERS** are past, present, and future United States of America (USA) citizens who number over one million, live, and/or conduct business (in the past, present, and/or future) in the USA, state of Illinois, County of Cook, and City of Chicago.

(b). **CLASS ONE** - are all past, present, and future African-American citizens

of the USA and State of Illinois who number more than ten thousand. All are also CLASS TWO members.

(c). CLASS TWO – are all past, present, and future citizens of the USA and of the State of Illinois who number more than ten thousand. Some are member of CLASS ONE.

(d). Plaintiffs are members of both Classes.

(e). The members of the Classes are so numerous that joinder of all members are impractical. There are questions of “law” and “fact(s)” common to the representative the Plaintiffs.

(f). The questions of “law” and “fact(s)” common to the class members predominate over any question affecting only claims of individual members.

(g). If individual actions were required to be brought by each class member, a multiplicity of suits would result, and would cause great and undue hardship to the parties and the court(s).

(h). Therefore, a class-action complaint is superior to other available methods for the fair and efficient adjudication of the controversy.

(i). The identity of all the class members are presently unknown to the named Plaintiffs, but can easily be determined from the past and present books and records of in the United States of America, State of Illinois, County of Cook, and City of Chicago; such as state courts’ files; public records; addresses and telephone records; utility records; state, county, and municipal records; census; social security; real estate property records; and unemployment insurance records; but not limited thereto.

(k). There are questions of “law” and “facts” common to the representative

parties and other members of the class and predominate over any question affecting only individual members.

(l). If individual actions were required to be brought by each member of the class, multiplicity of suits would result, causing great and undue hardship to the parties and the court.

(m). Therefore, a class-action is superior to other available methods for the fair and efficient adjudication of the controversy.

DATE: April 24, 2017

Respectfully submitted,

Without prejudice UCC 1-308



Marvin Faulkner, *Lead Plaintiff*

Marvin Faulkner, *Plaintiff*

828 North Ridgeland Ave.

Oak Park, Illinois 60302

1.312.404.3757

E-mail: mfaulkner@endjudicialcorruption.org

Without prejudice UCC 1-308



Samuel C. Umunna, *Co-Plaintiff*

Samuel C. Umunna, *Plaintiff*

8800 South Longwood Drive

Chicago, Illinois 60643

1.773.575.3630

E-mail: samummuna@juno.com

VERIFICATION

Under penalties as provided by law, Marvin Faulkner, Plaintiff, states that he has read the foregoing "*Second Amended Verified Complaint-Civil Rico*" and on the basis of personal knowledge, the review of relevant documentation and discussion with knowledgeable personnel certifies that the statements set forth therein are true and correct, except as to matters therein stated to be on information and belief and as to such matters, the undersigned, on behalf of Plaintiff, certifies as aforesaid that the undersigned verily believes the same to be true.

Without prejudice UCC 1-308

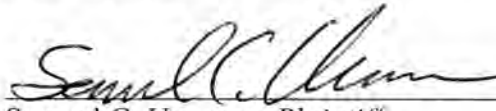


Marvin Faulkner, *Plaintiff*

VERIFICATION

Under penalties as provided by law, Samuel C. Umunna, Plaintiff, states that he has read the foregoing "*Second Amended Verified Complaint-Civil Rico*" and on the basis of personal knowledge, the review of relevant documentation and discussion with knowledgeable personnel certifies that the statements set forth therein are true and correct, except as to matters therein stated to be on information and belief and as to such matters, the undersigned, on behalf of Plaintiff, certifies as aforesaid that the undersigned verily believes the same to be true.

Without prejudice UCC 1-308



Samuel C. Umunna, *Plaintiff*

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

MARVIN FAULKNER, <i>et. al.</i> ,)	CIVIL ACTION / RICO CLAIM
[Plaintiff(s) herein, come)	Case No.: 16-cv-2432
Individually of themselves];)	
)	
<i>Plaintiff(s),</i>)	
v.)	Judge: Edmond E. Chang
)	Mag.:
ANNA M. LOFTUS, <i>et. al.</i> ,)	
[All government Defendant(s) are)	
Being sued in his/her individual)	
and/or their Official capacity],)	
<i>Defendant(s),</i>)	

Plaintiffs' Demand
for a Trial by Jury

FILED

APR 24 2017

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

NOTICE OF FILING

Case No.: 16-cv-2432

TO DEFENDANT(S) AND/OR THE ATTORNEY OF RECORD: **see** "Service List"

PLEASE TAKE NOTICE that on April 24, 2017, I/we or us shall file in the United States District Court for the Northern District of Illinois, Eastern Division, at 219 South Dearborn Street, Chicago, Illinois, and then and there present the attached filing: "PLAINTIFF(S)': MARVIN FAULKNER'S AND SAMUEL C. UMUNNA'S FILING THEIR "PLAINTIFFS' SECOND AMENDED VERIFIED COMPLAINT-CIVIL RICO" a true and correct copy of which was filed and served upon you publicly on April 24, 2017.


Respectfully submitted,

Without prejudice under UCC 1-308


Marvin Faulkner, *Plaintiff*

Marvin Faulkner, *Plaintiff*
828 North Ridgeland Avenue
Oak Park, Illinois 60302
1-312-404-3757

Without prejudice under UCC 1-308

and 
Samuel C. Umunna, *Plaintiff*

Samuel C. Umunna, *Plaintiff*
8800 South Longwood Dr.
Chicago, Illinois 60643
1-773-575-363



ORIGINAL

CERTIFICATE OF SERVICE

Case No.: 16-cv-2432

I, Marvin Faulkner, served a copy of the attached filing titled: "PLAINTIFF(S): MARVIN FAULKNER'S AND SAMUEL C. UMUNNA'S FILING THEIR "PLAINTIFFS' SECOND AMENDED VERIFIED COMPLAINT-CIVIL RICO" upon the "Service List" below to all parties of record via ECF: "Service of Documents by Electronic Means" and/or by U.S. Mail on 4/24/2017 of this matter at bar:

"SERVICE LIST"

DEFENDANT(S):

STEVEN E. ANDERSON (*Settled and Dismissed with prejudice via Plaintiffs ~ 10-6-2016*)

2949 North Troy Street
Chicago, Illinois 60618
1(312) 450-3513
sea@seandersonlaw.com

SHIRLEY RUTH CALLOWAY

Illinois Attorney General's Office
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Lead Attorney for:

-Anna M. Loftus; -George F. Scully Jr.; -Darryl B. Simko; -Alfred M. Swanson Jr.;
-Pamela Mclean Meyerson; -Raymond W. Mitchell; -Irwin J. Solganick; -Alexander P.
White; -Michael Otto(.

BRIAN R. MERFELD

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Lead Attorney for:

-Pierce & Associates; -Michael N. Varak; -Meredith Freeman.

KATHLEEN RUBY PASULKA

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Lead Attorney, Attorney To Be Noticed for:

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-ShoreBank;

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ATTORNEY TO BE NOTICED
Lead Attorney for:

-US Bank National Associates; -Nationstar Mortgage LLC;

PHILIP RUSSELL PERDEW

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Email: pperdew@lockelord.com
ATTORNEY TO BE NOTICED

WILLIAM FARROW

7936 South Cottage Grove Ave.,
Chicago, Illinois 60619

FEDERAL DEPOSIT INSURANCE CORPORATION

219 South Dearborn Street 5th Floor
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Email: USAILN.ECFAUSA@usdoj.gov

MICHAEL WILLIAM BEBRE, III

Chuhak & Tecson, PC
30 South Wacker Drive-Suite 2600
Chicago, Illinois 60606
Phone: 1-312-855-4603
Fax: 1-312-444-9027
Email: mdebres@chuhak.com
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I declare under penalty of perjury that the foregoing is true and correct, to the best of my knowledge on information and belief, executed on 4/24/2017.



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